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9
10 UNITED STATES DISTRICT COURT
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12 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION
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15 IN RE: CATHODE RAY TUBE (CRT)
16 ANTITRUST LITIGATION

Master File No. 3:07-cv-05944-JST

MDL No. 1917

17 This Document Relates to:

**PUBLIC EXHIBITS A, B, E, F, G, H, I
and
SEALED EXHIBITS C & D**

18
19
20
21
*Sears, Roebuck and Co. and Kmart Corp. v.
Chunghwa Picture Tubes, Ltd., No. 11-cv-
05514*

**TO DECLARATION OF CATHLEEN H.
HARTGE IN SUPPORT OF DEFENDANT
LG ELECTRONICS, INC.'S MOTION
FOR BIFURCATION AND BENCH
TRIAL**

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Judge: Honorable Jon S. Tigar
Date: September 22, 2016
Time: 2:00 p.m.
Courtroom: 9, 19th Floor

MDL No. 1917

Master No. 3:07-cv-05944-JST

**EXHIBITS A – I TO DECLARATION OF CATHLEEN HARTGE IN SUPPORT OF DEFENDANT LG
ELECTRONICS, INC.'S MOTION FOR BIFURCATION AND BENCH TRIAL**

EXHIBIT A

Supplemental Attachment A to Certain Direct Action Plaintiffs' Responses to Various Interrogatories
September 5, 2014

<u>DIRECT VENDOR</u>	<u>BASIS FOR STANDING</u>	<u>SUPPORT</u>
	Co-conspirator Orion Electric Co., Ltd. owned and controlled by the Daewoo Group (including Daewoo Electronics Corporation and Orion Electric Components, Co., Ltd.)	<p>Precht, Michael, et. al., The Korean Electronics Industry, CRC Press, (c) 1997, at 50-51, 91, available at: http://books.google.com/books?id=MorBBCG158YC&lpg=PA50&ots=txOfb2YQJ8&dq=orion%20electric%20after%20daewoo%20closed&pg=PA50#v=snippet&q=orion%20electric&f=false</p> <p>Harvard Business School, "Daewoo's Globalization: Uz-Daewoo Auto Project.", No. 9-598-065, March 23, 1998, at 19-21 of 35.</p> <p>Troubled Company Reporter, "ORION ELECTRIC: Creditor Opposition May Abort Sale" April 5, 2005, Vol. 8, No. 66, available at: http://bankrupt.com/TCRAP_Public/050405.mbx</p> <p>Amended Writ of Summons, <i>Curtis Sanders and Chung Hwa Picture Tubes, Ltd., et. al.</i> November 13, 2009, at 11-12 of 32, Case No. S-097394 (BCSC), available at: http://www.cmlawyers.ca/wp-content/uploads/2012/05/CRTCclasAction_Writ.pdf</p> <p>Steinberg, David, Korea's Changing Roles in Southeast Asia: Expanding Influence and Relations, Institute of Southeast Asian Studies, (c) 2010 at 132, available at: http://books.google.com/books?id=PnVF8G9rCjC&lpg=PA132&ots=IGjh5qklP8&dq=orion%20electric%20used%20to%20be%20owned%20by%20daewoo&pg=PA132#v=one-page&q=&f=false</p>
Daewoo Electronics America, Inc.	Daewoo Electronics America, Inc. owned and controlled by Daewoo Electronics Corporation	<p>Article, "Daewoo and VIXS Demonstrate the Latest in Wireless Home Entertainment Technology at CES," Jan. 8, 2004, available at: http://www.vixs.com/pressreleasdetail.php?a=112</p> <p>Appeal from the United States District Court for the Northern District of California in Case No. 04-CV-01830, Funai Electric Company Ltd. v. Daewoo Electronics Corp. et. al., Sept. 1, 2010 available at: http://patentyo.com/media/docs/2010/09/1225-1244.pdf</p> <p>Article, "Federal Circuit Finds Successor Company Liable for Infringement by Prior Company," September 6, 2010,available at: http://smplaw.wordpress.com/2010/09/06/federal-circuit-finds-successor-company-liable-for-infringement-by-prior-company/</p> <p>Article, "Successor to U.S. subsidiary liable for predecessor's patent damages liability notwithstanding its establishment pursuant to foreign agreement between foreign companies," October 28, 2010,available at: http://www.lexology.com/library/detail.aspx?g=78c13e38-711-4288-a07d-0f56a794c95e</p> <p>Memorandum of Law, <i>John Raburn, et. al. v. Doe Woo, Inc. et. al.</i>, (N.D. Texas 2010), Case 3:09-cv-01172-G, Dkt.. 21, available at: http://www.gpo.gov/fdsys/pkg/USCOURTS-txnd-3_09-cv-01172/pdf/USCOURTS-txnd-3_09-cv-01172-0.pdf</p> <p>Business Week, Company Overview of Daewoo Electronics America Inc., available at: http://investing.businessweek.com/research/stocks/private/snapshot.asp?privcapid=4236851</p> <p>Article, "NewStar Business Credit Provides \$15MM to Daewoo Electronics America," October 29, 2013,available at: http://www.abladvisor.com/news/3399/newstar-business-credit-provides-15mm-to-daewoo-electronics-america</p>
Daewoo Electronics Corporation	Orion Electric Co., Ltd. owned and controlled by the Daewoo Group (including Daewoo Electronics Corporation and Orion Electric Components, Co., Ltd.)	See entry for Daewoo Electronics America, Inc., <i>infra</i> .

Supplemental Attachment A to Certain Direct Action Plaintiffs' Responses to Various Interrogatories
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Hitachi America Ltd. Computer Division	<p>Hitachi America Ltd. Computer Division is an unincorporated business subdivision of Defendant Hitachi America, Ltd.</p> <p>Defendant Hitachi America, Ltd. owned and controlled by Defendant Hitachi Ltd.</p>	<p>Microboards Technology, "Hitachi Names Microboards International Distributor", January 25, 2000, available at: http://www.microboards.com/news-events/hitachi-names-microboards-international-distributor</p> <p>News Release, "Hitachi Showcases Technology Built For Fast Times At INFOCOMM 2000", June 15, 2000, available at: http://www.hitachi.us/about/press/archive/2000/061500.html</p> <p>Article, "Hitachi Launches Affordable, Feature-Rich Projector to Meet the Growing Multimedia Demands of Educators and Budget Conscious Businesses", June 11, 2001, available at: http://www.projectorcentral.com/news_story_308.htm</p> <p>News Release, "Hitachi America Forms New Digital Media Division", July 2, 2002, available at: http://www.hitachi-america.us/about/press/details/070222nd.html</p> <hr/> <p>Form 20-F filed with the U.S. SEC Fiscal Year ended March 31, 2001, at 16, http://www.hitachi.com/IR-e/library/20F/2001/index.htm</p> <p>Hitachi Ltd. 20-F Annual Report, filed March 31, 2002, at 19, available at http://www.sec.gov/Archives/edgar/data/47710/000114554902000252/k0264e20f.txt</p> <p>Hitachi Ltd. 20-F Annual Report, filed September 30, 2003, at 21, available at http://www.sec.gov/Archives/edgar/data/47710/000119312503056135/d20f.txt</p> <p>Hitachi Ltd. 20-F Annual Report, filed August 20, 2004, at 17 and 39, available at http://www.sec.gov/Archives/edgar/data/47710/000119312504144223/d20f.htm</p> <p>Hitachi Ltd. 20-F Annual Report, filed August 26, 2005, at 16, available at http://www.sec.gov/Archives/edgar/data/47710/000119312505174960/d20f.htm</p> <p>Hitachi Ltd. 20-F Annual Report, filed August 7, 2006, at 18, available at http://www.sec.gov/Archives/edgar/data/47710/000119312506163031/d20f.htm</p> <p>Hitachi Ltd. 20-F Annual Report, filed June 26, 2007, at 19, available at http://www.sec.gov/Archives/edgar/data/47710/000119312507142357/d20f.htm</p> <p>Hitachi Ltd. 20-F Annual Report, filed June 20, 2008, at 18, available at http://www.sec.gov/Archives/edgar/data/47710/000119312508137042/d20f.htm</p> <p>Hitachi Ltd. 20-F Annual Report, filed July 27, 2009, at 19, available at http://www.sec.gov/Archives/edgar/data/47710/000119312509155317/d20f.htm</p> <p>Hitachi Ltd. 20-F Annual Report, filed June 29, 2010, at 26, available at http://www.sec.gov/Archives/edgar/data/47710/000119312510149406/d20f.htm</p> <p>Hitachi Ltd. 20-F Annual Report, filed June 24, 2011, at 24 and 58, available at http://www.sec.gov/Archives/edgar/data/47710/000119312511172867/d20f.htm</p> <p>Hitachi Ltd. Annual Securities Report (FY 2012) at page 18, available at http://www.hitachi.com/IR-e/library/stock/hit_sr_fy2012_4_en.pdf</p> <p>Business Wire, "Hitachi Introduces 1998 Consumer Electronics Line", June 22, 1998, available at: http://www.siliconvestor.com/readreplies.aspx?msgid=4951725</p> <p>News Release, "Hitachi Debuts New "Ultravision Digital" Series Lineup", September 21, 1998, available at: http://www.hitachi.us/about/press/archive/1998/092198.html</p> <p>News Release, "Hitachi Introduces New DVD, Camcorder and VCR Line During 2001 International CES", January 4, 2001, available at: http://www.hitachi.us/about/press/archive/2001/01042001.html</p> <p>News Release, "Hitachi Expands Projection Television Line Up With Nine New HDTV Monitors and Four New Conventional Sets", May 29, 2001, available at http://www.hitachi.us/about/press/archive/2001/05292001c.html</p> <p>News Release, "Hitachi Integrates HDTV Tuners, DVI and IEEE 1394 With 5C Into New Projection Televisions", May 31, 2002, available at http://www.hitachi.us/about/press/archive/2002/053102.html</p> <p>Business Wire, "Hitachi Projection Televisions Go All Digital; New Line Features 1080p Digital Video Processor, Learning AV Net and Integrated Sets with POD", June 16, 2003, available at: http://www.businesswire.com/news/home/20030616005286/en/Hitachi-Projection-TVs-Digital-Line-Features-1080p</p> <p>Business Wire, "HITACHI 2006 BIG SCREEN PROJECTION LINE FEATURES DRAMATICALLY DESIGNED MODELS AND BEST-IN-CLASS PERFORMANCE", January 5, 2006, available at http://www.businesswire.com/news/home/20060105005057/en/Hitachi-2006-Big-Screen-Projection-Line-Features</p> <p>Business Wire, "Hitachi Unveils 50-Inch Ultra Thin Plasma Display", September 4, 2008, available at: http://www.businesswire.com/news/google/20080904005256/en</p> <hr/> <p>Deposition of Thomas L. Heiser, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i>, July 3, 2012 at 30:4-6; 382:16-18</p> <p>Deposition of Yasuhiro Morishima, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i>, July 12, 2012 at 370:5-24</p> <p>Deposition of William Whalen, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i>, August 23, 2012 at 92:11-13</p> <p>Deposition of Modesto Rodriguez, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i>, August 23, 2012 at 26:23-27:3</p> <p>Hitachi Entitles' Responses and Objections to DAP's 1st Set of Requests for Admission, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i>, February 18, 2014</p> <p>Defendant Hitachi Home Electronics (America) Inc.'s Statement Pursuant to Rule 7.1 in <i>Kentucky Bureau Mutual Insurance Company v. Hitachi Home Electronics (America), Inc.</i>, at 1, Case No. 3:08-cv-00030-DCR-JBT, Dkt. No. 2 dated June 23, 2008 (E.D. Ky.)</p>

Supplemental Attachment A to Certain Direct Action Plaintiffs' Responses to Various Interrogatories
September 5, 2014

Defendant Hitachi Displays, Ltd. owned and controlled by Defendant Hitachi, Ltd.	<p>Article, "For the Spin-Off of the Display Business by Company Split," June 18, 2002, available at: http://translate.google.com/translate?hl=en&sl=ja&u=http://www.hitachi.co.jp/New/cnews/2002/0618a/index.html&prev=/search%3fq%3D%2522hitachi%28ltd.%2522%2B%2522hitachi%28display%28ltd.%2522%26h%3Den%26s%3DX%26tbo%3Dd%26bw%3D1366%26bin%3D592%26tbs%3Odr:1,cd_min:1/1/2001,cd_max:12/31/2003&sa=X&ei=AQDnUK7uMcaHOHR_4DwCg&ved=0CGIQ7geWbw</p> <p>Hitachi Ltd. 20-F Annual Report, filed September 30, 2003, at 20, available at http://www.sec.gov/Archives/edgar/data/47710/000119312503056135/d20f.txt</p> <p>Hitachi Ltd. 20-F Annual Report, filed August 20, 2004, at 16, available at http://www.sec.gov/Archives/edgar/data/47710/000119312504144223/d20f.htm</p> <p>Hitachi Ltd. 20-F Annual Report, filed August 26, 2005, at 16, available at http://www.sec.gov/Archives/edgar/data/47710/000119312505174960/d20f.htm</p> <p>Hitachi Ltd. 20-F Annual Report, filed August 7, 2006, at 17, available at http://www.sec.gov/Archives/edgar/data/47710/000119312506163031/d20f.htm</p> <p>Hitachi Ltd. 20-F Annual Report, filed June 26, 2007, at 13, 21, 24, available at http://www.sec.gov/Archives/edgar/data/47710/000119312507142357/d20f.htm</p> <p>Hitachi Ltd. 20-F Annual Report, filed June 20, 2008, at 17 and 55, available at http://www.sec.gov/Archives/edgar/data/47710/000119312508137042/d20f.htm</p> <p>Hitachi Ltd. 20-F Annual Report, filed July 27, 2009, at 19, available at http://www.sec.gov/Archives/edgar/data/47710/000119312509155317/d20f.htm</p> <p>Hitachi Ltd. 20-F Annual Report, filed June 29, 2010, at 26, available at http://www.sec.gov/Archives/edgar/data/47710/000119312510149406/d20f.htm</p> <p>Hitachi Ltd. 20-F Annual Report, filed June 24, 2011, at 24, available at http://www.sec.gov/Archives/edgar/data/47710/000119312511172867/d20f.htm</p> <p>Hitachi Displays, Ltd. Responses and Objections to DAP's 1st Set of Requests for Admission, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i>, February 18, 2014</p> <p>Hitachi, Ltd. Responses and Objections to DAP's 1st Set of Requests for Admission, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i>, February 18, 2014</p> <p>Deposition of Thomas L. Heiser, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i>, July 3, 2012 at 30:12-21; 30:22-31; 32:3-9</p> <p>News Release 12/25/2007 Hitachi, Canon and Matsushita Reach Basic Agreement on LCD Panel Business, available at http://www.hitachi.com/New/cnews/f_071225.pdf</p> <p>News Release 2/27/2008 Conclusion of Formal Contract Between Hitachi and Canon Related to Comprehensive LCC Panel Business Alliance, available at http://www.hitachi.com/New/cnews/f_080227a.pdf</p> <p>News Release 11/15/2011 INCI., Hitachi, Sony and Toshiba Sign Definitive Agreements Re Integration of Small- and Medium-Sized Display Businesses, available at http://www.hitachi.com/New/cnews/f_111115a.pdf</p>
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September 5, 2014

		Nissei Sangyo Co., Ltd Annual Report 2000, at 16, 19, 31, available at: http://www.hitachi-hitec.com/global/ir/direpor/ar2000.pdf Nissei Sangyo Co., Ltd Annual Report 2001, at 13, 15, 27, available at: http://www.hitachi-hitec.com/global/ir/direpor/ar2001.pdf Nissei Sangyo Co., Ltd Annual Report 2002, at 8, available at: http://www.hitachi-hitec.com/global/ir/direpor/ar2002.pdf Nissei Sangyo Co., Ltd Annual Report 2003, at 10, available at: http://www.hitachi-hitec.com/global/ir/direpor/ar2003.pdf Nissei Sangyo Co., Ltd Annual Report 2004, at 29, available at: http://www.hitachi-hitec.com/global/ir/direpor/ar2004.pdf Nissei Sangyo Co., Ltd Annual Report 2005, at 30, available at: http://www.hitachi-hitec.com/global/ir/direpor/ar2005.pdf Nissei Sangyo Co., Ltd Annual Report 2006, at 32, available at: http://www.hitachi-hitec.com/global/ir/direpor/ar2006.pdf Nissei Sangyo Co., Ltd Annual Report 2007, at 32, available at: http://www.hitachi-hitec.com/global/ir/direpor/ar2007.pdf Statement of Stephen D. Snake, Executive Vice President and General Counsel for Hitachi High Technologies America, Inc., at 1, available at: http://www.irs.gov/pub/irs-ap/14-11114.pdf Ilene Hersher, USITC, "Dynamic random access memory semiconductors of 256 kilobits and above from Japan", 1986, at A-9, available at: http://books.google.com/books?id=KDVOU8pkchYC&pg=RA1-PA9&ots=QmjZE4pGvM&dq=%22Nissei%20Sangyo%20America,%20Ltd.%22%20subsidiary&pg=RA1-PA9#v=onepage&q=%22Nissei%20Sangyo%20America,%20Ltd.%22%20subsidiary&f=false Article, "Hitachi High-Technologies America Formed to Address High-End Instrumentation Solutions Market", March 20, 2002, available at: http://www.hitachi-america.us/about/press/details/032002.html
		Deposition of Yasuhiro Morishima, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i> , July 12, 2012 at 68:20-70:3, 70:20-24 Deposition of Nobuhiko Kobayashi, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i> , July 17, 2012 at 88:15-20 Hitachi Entities' Responses and Objections to DAP's 1st Set of Requests for Admission, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i> , February 18, 2014 Nissei Sangyo Co., Ltd Annual Report 2000, at 42, available at: http://www.hitachi-hitec.com/global/ir/direpor/ar2000.pdf Nissei Sangyo Co., Ltd Annual Report 2001, at 7, 38, available at: http://www.hitachi-hitec.com/global/ir/direpor/ar2001.pdf Nissei Sangyo Co., Ltd Annual Report 2002, at 17, 22, available at: http://www.hitachi-hitec.com/global/ir/direpor/ar2002.pdf Nissei Sangyo Co., Ltd Annual Report 2003, at 24, available at: http://www.hitachi-hitec.com/global/ir/direpor/ar2003.pdf Nissei Sangyo Co., Ltd Annual Report 2004, at 44, 55, available at: http://www.hitachi-hitec.com/global/ir/direpor/ar2004.pdf Nissei Sangyo Co., Ltd Annual Report 2005, at 24, 40, 50, 61, available at: http://www.hitachi-hitec.com/global/ir/direpor/ar2005.pdf Nissei Sangyo Co., Ltd Annual Report 2006, at 11, 42, 53, 63, available at: http://www.hitachi-hitec.com/global/ir/direpor/ar2006.pdf Nissei Sangyo Co., Ltd Annual Report 2007, at 28, 42, 53, 63, available at: http://www.hitachi-hitec.com/global/ir/direpor/ar2007.pdf Statement of Stephen D. Snake, Executive Vice President and General Counsel for Hitachi High Technologies America, Inc., at 1, available at: http://www.irs.gov/pub/irs-ap/14-11114.pdf Hitachi Ltd. 20-F Annual Report, filed March 31, 2002, at 18 (ownership interest 73.4%), available at http://www.sec.gov/Archives/edgar/data/47710/000114554902000252/k00264e20f.txt Hitachi Ltd. 20-F Annual Report, filed September 30, 2003, at 9, 20 (ownership interest 67.6%), available at http://www.sec.gov/Archives/edgar/data/47710/00011931250356135/d20f.txt Hitachi Ltd. 20-F Annual Report, filed August 20, 2004, at 16, 96 (ownership interest 55.4%), available at http://www.sec.gov/Archives/edgar/data/47710/000119312504144223/d20f.htm Hitachi Ltd. 20-F Annual Report, filed March 31, 2002, at 18 (ownership interest 73.4%), available at http://www.sec.gov/Archives/edgar/data/47710/000114554902000252/k00264e20f.txt Hitachi Ltd. 20-F Annual Report, filed August 7, 2006, at 17 (ownership interest 51.7%), available at http://www.sec.gov/Archives/edgar/data/47710/000119312506163031/d20f.htm Hitachi Ltd. 20-F Annual Report, filed June 26, 2007 (ownership interest 51.7%), at 18, 25, available at http://www.sec.gov/Archives/edgar/data/47710/000119312507142357/d20f.htm Hitachi Ltd. 20-F Annual Report, filed June 20, 2008, at 13, 17, 23, 29, 30 (51.7%), available at http://www.sec.gov/Archives/edgar/data/47710/000119312508137042/d20f.htm Hitachi Ltd. 20-F Annual Report, filed July 27, 2009, at 14, 19 (51.8%), available at http://www.sec.gov/Archives/edgar/data/47710/000119312509155317/d20f.htm Hitachi Ltd. 20-F Annual Report, filed June 29, 2010, at 21, 26 (ownership interest 51.8%), available at http://www.sec.gov/Archives/edgar/data/47710/000119312510149406/d20f.htm Hitachi Ltd. 20-F Annual Report, filed June 24, 2011, at 19, 24 (ownership interest 51.8%), available at http://www.sec.gov/Archives/edgar/data/47710/00011931251172867/d20f.htm Article, "Hitachi High-Technologies America Formed to Address High-End Instrumentation Solutions Market", March 20, 2002, available at: http://www.hitachi-america.us/about/press/details/032002.html Hitachi Ltd. Annual Securities Report (FY 2012) at page 14 (Hitachi, Ltd.s ownership interest 51.8%), available at http://www.hitachi.com/R-e/library/stock/hit_sr_fy2012_4_en.pdf
Nissei Sangyo America, Ltd. (n/k/a Hitachi High-Technologies America, Inc.)		
		Nissei Sangyo Co., Ltd. (n/k/a Hitachi High-Technologies Corporation) owned and controlled by Defendant Hitachi, Ltd.

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<p>LG Electronics U.S.A., Inc., owned and controlled by Defendant LG Electronics, Inc. (f/k/a GoldStar Co. Ltd.)</p> <p>LG Electronics U.S.A., Inc.</p>	<p>LG Electronics Inc. 1998 Annual Report, at 31, 33 and 37-39, available at http://www.lge.co.kr/upload/IRMR/Annual_report_1998[0].pdf LG Electronics Inc. 1999 Annual Report, at 35, 40, 44, 47, available at http://www.lg.com/global/pdf/annual-report-1999.pdf LG Electronics Inc. 1999 Audit Report, at 21, 34, 45, available at: http://www.lg.com/global/pdf/audit-report-1999.pdf LG Electronics Inc. 2000 Annual Report, at 58, 65, 72, 77, available at: http://www.lg.com/global/pdf/annual-report-2000.pdf LG Electronics Inc. 2000 Audit Report, at 24, 38, 52, available at: http://www.lg.com/global/pdf/audit-report-2000.pdf LG Electronics Inc. 2001 Annual Report, at 8, 63, 74, available at: http://www.lg.com/global/pdf/annual-report-2001.pdf LG Electronics Inc. 2001 Audit Report 2001, at 24, 37, 53, available at: http://www.lg.com/global/pdf/audit-report-2001.pdf LG Electronics Inc. 2002 Annual Report, at 34, 36, available at: http://www.lg.com/global/pdf/annual-report-2002.pdf LG Electronics Inc. 2002 Audit Report, at 24, 29, 30, 37, 46, available at: http://www.lg.com/global/pdf/audit-report-2002.pdf LG Electronics Inc. 2003 Annual Report, at 73, 77-89, 89, available at: http://www.lg.com/global/pdf/annual-report-2003.pdf LG Electronics Inc. 2003 Audit Report, at 25, 30-33, 42, 52, available at: http://www.lg.com/global/pdf/audit-report-2003.pdf LG Electronics Inc. 2004 Annual Report, at 84, 88-91, 101, 108, 127, available at: http://www.lg.com/global/pdf/annual-report-2004.pdf LG Electronics Inc. 2004 Audit Report, at 27, 32-35, 45, 53, available at: http://www.lg.com/global/pdf/audit-report-2004.pdf LG Electronics Inc. 2005 Audit Report, at 28, 33-35, 37, 48, 59, available at: http://www.lg.com/global/pdf/audit-report-2005.pdf LG Electronics Inc. 2006 Annual Report, at 60, available at: http://www.lg.com/global/pdf/annual-report-2006.pdf LG Electronics Inc. 2006 Consolidated Financial Statements, at 3, 14, 17, 46 of 64, available at: http://www.lg.com/global/pdf/financial-statements-2006.pdf LG Press Release. LG Electronics USA Names K.J. Kwon To President of the Consumer Electronics Division. July 26, 2006, http://www.lg.com/us/press-release/lg-electronics-usa-names-ki-kwon-to-president-of-the-consumer-electronics-division LG Electronics Inc. 2007 Consolidated Financial Statements, at 15, 17, 27, 46-47, available at: http://www.lg.com/global/pdf/financial-statements-2007.pdf LG Electronics Inc. 2008 Annual Report, at 39, available at: http://www.lg.com/global/pdf/annual-report-2008.pdf LG Electronics Inc. 2008 Consolidated Financial Statements, at 14, 16, 40, available at: http://www.lg.com/global/pdf/LGE_2008consolidated.pdf LG Electronics Inc. 2009 Consolidated Financial Statements, at 15-16, 40, available at: http://www.lg.com/global/pdf/LGE_2009_English+report+(Consolidated).pdf LG Electronics Inc. 2010 Separate Interim Financial Statements, at 37, 61, 64, available at: http://www.lg.com/global/pdf/LGE-2010-4Q-Consolidation.pdf LG Electronics Inc. 2011 Separate Interim Financial Statements, at 38, 60, 64, available at: http://www.lg.com/global/pdf/%5B2011%5DConsolidated-Interim-Financial-Statements.pdf LG Electronics Inc. 2012 3Q Separate Interim Financial Statements, at 16, 31, 35, available at: http://www.lg.com/global/pdf/2012_3Q_LG_Interim_Separate_Financial_Statement.pdf LG Electronics Inc. Separate Financial Statements 2012 at 39, available at: http://www.lg.com/global/investor-relations/reports/financial-statements LG Electronics Inc. 2013 Consolidated Financial Statements at 18, available at: http://www.lg.com/global/investor-relations/reports/financial-statements Zenith Electronics Corporation Corporate Disclosure Statement Pursuant to Rule 7.1 in Zenith Electronics Corp. v. V, Inc.; Westinghouse Digital Electronics LLC, 5:06-cv-00246-DF, Dkt. 2, October 30 2006 (E.D. Texas) LG Entities' Objections and Responses to DAP's 1st Set of Interrogatories, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i>, July 10, 2014 LG Entities' Objections and Responses to DAP's 1st Set of Requests for Admission, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i>, July 10, 2014 Deposition of Yun Seok Lee, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i>, July 11, 2012 at 22:23-23: ----- LG Electronics Inc. 2001 Audit Report 2001, at 3, 11, 24, 58, available at: http://www.lg.com/global/pdf/audit-report-2001.pdf LG Electronics Inc. 2001 Annual Report, at 45, 53, 64, 90, available at: http://www.lg.com/global/pdf/annual-report-2001.pdf LG Electronics Inc. 2002 Audit Report, at 25, 31, available at: http://www.lg.com/global/pdf/audit-report-2002.pdf LG Electronics Inc. 2002 Annual Report, at 34, available at: http://www.lg.com/global/pdf/annual-report-2002.pdf Joint Venture Agreement by and between LG Electronics, Inc. and Koninklijke Philips Electronics N.V., June 11, 2001 (LGE0000054-161), at 26-27. Deposition of Mok Hyeon Seong, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i>, July 9, 2012 at 55:3-17; 61:10-14 Deposition of Thomas Heiser, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i>, March 18, 2014 at 159:5-13 Deposition of Kyung Tae Kwon, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i>, July 13, 2012 at 40:4-9 Deposition of Jim Smith, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i>, December 12, 2013 at 74:11-15; 207:14-18; 263:5-11; 366:23-367:7 Deposition of Duk Chul Ryu, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i>, January 15, 2014 at 51:12-22 LG Entities' Objections and Responses to DAP's 1st Set of Requests for Admission, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i>, July 10, 2014 Philips Entities' Responses and Objections to DAP's 1st Set of Interrogatories, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i>, July 10, 2014 Philips Entities' Responses and Objections to DAP's 1st Set of Requests for Admission, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i>, July 10, 2014 Deposition of Patrick Caravan, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i>, January 30, 2014 at 50:14-21 </p>
<p>LG Electronics U.S.A., Inc.</p>	<p>LG Philips Displays Holding B.V. (n/k/a LP Displays) owned and controlled by Defendant LG Electronics, Inc. (f/k/a GoldStar Co. Ltd.) and Defendant Koninklijke Philips Electronics N.V.</p>

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Zenith Electronics Corporation (a/k/a Zenith Electronics LLC) owned and controlled by Defendant LG Electronics, Inc.	
LG Electronics U.S.A., Inc. owned and controlled by LG Electronics, Inc.	

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Mitsubishi Electronics America, Inc.	Mitsubishi Electronics America, Inc. owned and controlled by Defendant Mitsubishi Electric Corp.	Article, "Mitsubishi Electric to Restructure", Oct. 30, 1998, available at: http://articles.latimes.com/1998/oct/30/business/la-37566 Mitsubishi Entities' Response to DAP's Second Set of Interrogatories, In Re: Cathode Ray (CRT) Antitrust Litigation , July 24, 2014 Mitsubishi Entities' Response to DAP's First Set of Requests for Admission, In Re: Cathode Ray (CRT) Antitrust Litigation , July 24, 2014 Book, Certain Dynamic Random Access Memories and Components Thereof, Inv. 337-TA-242, November 1987, at 5, available at: http://books.google.com/books?id=ijbs3kBwo7YC&pg=PA8-IA9&ots=iBlE_PjzEY&dq=%22Mitsubishi%20Electronics%20America%2C%20Inc.%22&pg=PA8-IA9#v=onepage&q=%22Mitsubishi%20Electronics%20America,%20Inc.%22&f=false Order Denying Plaintiff's Motion for Partial Summary Judgment of an Established Royalty Rate as the Reasonable Royalty for the Simm Patients, <i>Wang Laboratories, Inc. v. Mitsubishi Electronics America, Inc.</i> , 860 F.Supp. 1448 (C.D. California 1993), available at: http://www.leagle.com/decision/19932308860fSupp1448_12122 Article, "Mitsubishi Merges 2 U.S. Subsidiaries : Reorganization: Its consumer electronics group in Cypress and high-tech marketing group in Torrance will be combined in a single Cypress-based entity", July 17, 1990, available at: http://articles.latimes.com/1990-07-17/business/la-391_1_consumer-electronics-group Article, "Mitsubishi Unit Named in Complaint : Electronics: The action by the U.S. International Trade Commission could lead to a ban on the import and sale of the company's semiconductors", August 28, 1993, available at: http://articles.latimes.com/1993-08-28/business/la-37120_1_national-semiconductor "BLACK AND WHITE CIF IMAGE SENSOR M64287U", 1999, available at: http://www.ic72.com/pdf_file/m/118868.pdf Article, "Mitsubishi Electronics America's Real Time Visualization maker European debut at ECR 2000", March 5, 2000, available at: http://www.teratecon.com/wordpress/press-release/mitsubishi-electronics-americas-real-time-visualization-makes-european-debut-at-ecr-2000 "M16C/62 PRODUCT OVERVIEW", 1997, available at: http://icwic.com/icwic/data/pdf/cd/cd006/228318.pdf Article, "Mitsubishi restructures electronics operations", October 30, 1998, available at: http://www.eetimes.com/document.asp?doc_id=1119493

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	NEC USA, Inc. wholly owned and controlled by NEC Corp.	NEC America, Inc., NEC Display Solutions of America, Inc., NEC Solutions (America), Inc., and NEC Unified Solutions, Inc. Corporate Disclosure Statement Pursuant to Rule 7.1 in <i>Technology Properties Limited, Inc. v. Fujitsu Limited et al.</i> , Case No. 2:05-cv-00494-TJW, Dkt. No. 34 (dated Jan. 11, 2006) (E.D. Tex.) Disclosure Statement of NEC Corporation, NEC Electronics America, Inc., NEC Corporation of America, NEC Display Solutions of America, Inc., NEC Financial Services, Inc., NEC USA, and NEC America in Orion IP, LLC v. Yokohama Tire Corp., et al. Case No. 6:06-cv-00364-LED, Dkt. No. 89 (dated Nov. 10, 2006) (E.D. Tex.) NEC Chart of Consolidated Subsidiaries, September 30, 2001, available at: http://www.nec.co.jp/press/en/0110/images/2603-03.pdf Article, "NEC USA, NEC America & NEC Solutions (America) to be Combined to Form NEC Corporation of America", Apr. 26, 2006, http://www.nec.co.jp/press/en/0604/2602.html Article, "NEC USA Promotes Gerald Kenney to Senior Vice President and General Counsel; Kenney to Oversee All Legal Operations at NEC USA Companies", April 6, 2004, available at: http://www.businesswire.com/news/home/20040406005449/en/NEC-USA-Promotes-Gerald-Kenney-Senior-Vice#UxjItM4qvKc
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	NEC Corporation of America owned and controlled by NEC Corp.	Article, "NEC Corporation of America Begins Operations as a Newly Integrated Company", July 3, 2006, available at: http://www.necunifiedsolutions.com/main/NewsEvents/NewPressPage.asp?release=2006070301.xml Disclosure Statement of NEC Corporation, NEC Electronics America, Inc., NEC Corporation of America, NEC Display Solutions of America, Inc., NEC Financial Services, Inc., NEC USA, and NEC America in Orion IP, LLC v. Yokohama Tire Corp., et al. Case No. 6:06-cv-00364-LED, Dkt. No. 89 (dated Nov. 10, 2006) (E.D. Tex.) Article, "Verizon and NEC Set New Record for Transmitting High Bit-Rate Technologies Over Fiber Field", Mar. 13, 2012, available at: http://www.necam.com/About/read.cfm?ID=9c1e04a3-80b8-481f-9370-be6ed51393f Article, "NEC Sets TPC Benchmark E (TPC-E) Performance Record", Mar. 29, 2012, available at: http://www.necam.com/About/read.cfm?ID=932e575c-9ddf-42d4-841a-e0052b591975 Article, "NEC USA, NEC America & NEC Solutions (America) to be Combined to Form NEC Corporation of America", Apr. 26, 2006, http://www.nec.co.jp/press/en/0604/2602.html Article, "Shinsuke Takahashi Joins NEC Corporation of America as President and CEO", January 10, 2013, available at: http://www.necam.com/About/read.cfm?ID=a2a2f768-85ee-44e3-9a78-d9511a8e830c

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Joint venture NEC Display Solutions, Ltd. (f/k/a NEC-Mitsubishi Electric Visual Systems Corp.) jointly owned and controlled by Defendant Mitsubishi Electric Corp. and NEC Corp.	<p>NEC Corp. 20-F Annual Report dated Sept. 28, 2000 at 5, http://www.sec.gov/Archives/edgar/data/72127/000095012300008913/k00152e20-f.txt Article, "NEC & Mitsubishi Electric Establish Display Monitor Businesses" Jan. 28, 2000, available at http://www.nec.co.jp/press/en/0001/2801.html</p> <p>NEC Corp. 20-F Annual Report dated Sept. 21, 2001 at F-15, http://www.sec.gov/Archives/edgar/data/72127/00014554901500046/k00188e20-f.htm</p> <p>NEC Corp. 20-F Annual Report dated Aug. 6, 2002 at F-15, http://www.sec.gov/Archives/edgar/data/72127/000114554902000196/k00250e20vf.txt NEC Corp. 20-F Annual Report dated Sept. 1, 2003 at F-15, http://www.sec.gov/Archives/edgar/data/72127/000114554903001173/k00497e20vf.txt NEC Corp. 20-F Annual Report dated Sept. 17, 2004 at F-16, http://www.sec.gov/Archives/edgar/data/72127/000095012304011077/k00743e20vf.htm Article, "NEC-MITSUBISHI Begins Operations as NEC Display Solutions", Apr. 1, 2005, available at: http://www.necdisplay.com/press-release/nec-mitsubishi-begins-operations-as-nec-display-so/413</p> <p>Regulation (EEC) No. 4064/89 Merger Procedure, Case No. COMP/M.1883-NEC/MITSUBISHI, dated Mar. 4, 2000, available at: http://ec.europa.eu/competition/mergers/cases/decisions/m1883_en.pdf</p> <p>NEC Corporation Responses and Objections to Direct Action Plaintiffs' First Set of Requests for Admission, April 11, 2013, In <i>Re TFT-LCD (Flat Panel) Antitrust Litigation</i>, MDL No. 1827</p> <p>Joint Venture Agreement, NEC Corporation and Mitsubishi Electric Corporation, December 27, 1999; NMV Articles of Incorporation of NEC-Mitsubishi Electric Visual Systems Corporation, December 27, 1999</p> <p>Mitsubishi Entities' Response to DAP's Second Set of Interrogatories, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i>, July 24, 2014</p> <p>Mitsubishi Entities' Response to DAP's First Set of Requests for Admission, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i>, July 24, 2014</p> <p>NEC Corporation Responses and Objections to Direct Action Plaintiffs' First Set of Requests for Admission, April 11, 2013, In <i>Re TFT-LCD (Flat Panel) Antitrust Litigation</i>, MDL No. 1827</p>
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NEC Technologies, Inc., NEC Systems, Inc., and NEC Computers Inc. merged to form NEC Solutions (America), Inc.	Article, "NEC Technologies, Visual Systems Introduces New Website", March 12, 2002, available at: http://presentationmaster.digitalmedianet.com/article/NEC-Technologies-Visual-Systems-Introduces-New-Website-8611 Article, "NEC unveils high-performance chip", April 29, 2002, available at: http://www.bizjournals.com/sacramento/stories/2002/04/29/daily2.html Article, "NEC Solutions America Gets CEO", June 16, 2003, available at: http://www.lightreading.com/nec-solutions-america-gets-ceo/d_id/592604 NEC Corp. 20-F Annual Report dated Sept. 1, 2003 at F-15, available at: http://www.sec.gov/Archives/edgar/data/72127/000114554903001173/k00497e20vf.txt NEC Corp. 20-F Annual Report dated Sept. 17, 2004 at F-16, available at: http://www.sec.gov/Archives/edgar/data/72127/000095012304011077/k00743e20vf.htm NEC Corp. 20-F Annual Report dated Sept. 25, 2005 at "Organizational Structure", available at: http://www.sec.gov/Archives/edgar/data/72127/000114554905001703/k0103e20vf.htm
NEC Solutions (America), Inc. owned and controlled by NEC USA, Inc.	See entry for NEC Corporation of America, <i>infra</i> .
NEC USA, Inc. owned and controlled by NEC Corp.	See entry for NEC Corporation of America, <i>infra</i> .
NEC USA, Inc., NEC America, Inc., and NEC Solutions (America), Inc. merged to form NEC Corporation of America	See entry for NEC Corporation of America, <i>infra</i> .
NEC Corporation of America wholly owned and controlled by NEC Corp.	See entry for NEC Corporation of America, <i>infra</i> .
Joint venture NEC Display Solutions, Ltd. (f/k/a NEC-Mitsubishi Electric Visual Systems Corp.) jointly owned and controlled by Defendant Mitsubishi Electric Corp. and NEC Corp.	See entry for NEC Corporation of America, <i>infra</i> .

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NEC Display Solutions of America, Inc. (f/k/a NEC-Mitsubishi Electronics Display of America)	NEC Display Solutions of America, Inc. owned and controlled by joint venture NEC Display Solutions Ltd. (f/k/a NEC-Mitsubishi Electric Visual Systems Corp.)	Article, "NEC-MITSUBISHI Begins Operations as NEC Display Solutions", Apr. 1, 2005, available at: http://www.necdisplay.com/press-release/nec-mitsubishi-begins-operations-as-nec-display-so/413	
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		Article, "NEC-Mitsubishi Electronics Display of America, Inc. Appoints T.J. Trojan As President and Chief Operating Officer; Leadership to Focus Company on Growth in New Display Applications for Customers, Businesses and Specialty Markets", October 1, 2003, available at http://www.prnewswire.com/news-releases/nec-mitsubishi-electronics-display-of-america-inc-appoints-tj-trojan-as-president-and-chief-operating-officer-72319722.html	
Mitsubishi Entities' Response to DAP's Second Set of Interrogatories, In Re: Cathode Ray (CRT) Antitrust Litigation, July 24, 2014		Mitsubishi Entities' Response to DAP's First Set of Requests for Admission, In Re: Cathode Ray (CRT) Antitrust Litigation, July 24, 2014	
Joint venture NEC Display Solutions Ltd. (f/k/a NEC-Mitsubishi Electric Visual Systems Corp.) owned and controlled by Defendant Mitsubishi Electric Corp. and NEC Corp.		See entry for NEC Corporation of America, <i>infra</i> .	

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Packard Bell NEC, Inc. (a/k/a PB Electronics)	Packard Bell NEC, Inc. owned and controlled by NEC Corp.	See NEC Press Release (Japanese) 7/31/1998, available at http://www.nec.co.jp/press/ja/9807/3101.htm . NEC Corp.'s 2000 20-F filing (filed March 31, 2000 at F-16), available at http://www.sec.gov/Archives/edgar/data/72127/000095012300008913/k00152e20-f.txt NEC Corp's 2001 20-F filing (filed September 21, 2001), available at http://www.sec.gov/Archives/edgar/data/72127/000114554901500046/k00188e20-f.txt
	Joint venture NEC Display Solutions, Ltd. (f/k/a NEC-Mitsubishi Electric Visual Systems Corp.) jointly owned and controlled by Defendant Mitsubishi Electric Corp. and NEC Corp.	See entry for NEC Corporation of America, <i>infra</i> .
Panasonic Consumer Electronics Co.	Panasonic Consumer Electronics Co. is an unincorporated division of Defendant Panasonic Corporation of North America (f/k/a Matsushita Electric Corporation of America)	See Hughes v. Panasonic Consumer Electronics Co., 2011 WL 2976839 at *1 (D.N.J. 2011) See Memorandum of Law in Support of Defendant's Motion to Dismiss the First Amended Complaint in <i>Hughes v. Panasonic Consumer Electronics Co.</i> , at 4, April 27, 2010, (E.D. N.J.), Case No. 2:10-cv-00846-SDW-MCA, Dkt. 9. Article, "Panasonic picks a former BestBuy.com executive to head consumer sales", July 29, 2013, available at: http://www.internetretailer.com/2013/07/29/panasonic-hires-former-bestbuycom-executive Panasonic/Technics Audio Products Limited Warranty, at 1, available at: http://www2.panasonic.com/static/Warranty/WARRANTY_HomeAudio.pdf Panasonic Entities' Objections and Responses to DAP's 1st Set of Requests for Admission, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i> , July 10, 2014 Deposition of Masahiro Kimura, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i> , July 19, 2012 at 34:8-35:3 Panasonic North America Company Profile, http://www.panasonic.com/about/overview.asp <i>Fortino v. Quasar Co., a Division of Matsushita Electric Corporation of America</i> , 950 F.2d 389, 391 (7th Cir. 1991) <i>Clark v. Matsushita Electric Industrial Co., Ltd., et al.</i> , 811 F.Supp. 1061, 1064, 1068 (M.D. Pa 1993) Article, "Matsushita's North American Operations To Form New Management Team", February 13, 1997, available at: http://www.thefreelibrary.com/Matsushita%27s+North+American+Operations+To+Form+New+Management+Team..-a019123132 Environmental Report 1999, at 74, available at http://panasonic.net/sustainability/en/downloads/back_number/index.html Environmental Sustainability Report 2001, at 44-46, available at http://panasonic.net/sustainability/en/downloads/back_number/index.html Environmental Sustainability Report 2002, at 13, 71-72, available at http://panasonic.net/sustainability/en/downloads/back_number/index.html Panasonic Corporation 20-F Annual Report, filed September 10, 2003, at 29, available at http://www.sec.gov/Archives/edgar/data/63271/000119312503047505/d20f.htm Article, Matsushita Announces Proposed Senior Management Changes. April 28, 2004, at 4 of 4, http://panasonic.net/ir/relevant/en040428-4/en040428-4-1.pdf (last visited 1/3/13). Panasonic Corp. 20-F Annual Report at 18, filed 2001-7-31 Panasonic Corp. 20-F Annual Report at 25, filed 2002-7-22 Panasonic Corp. 20-F Annual Report at 29, filed 2003-9-10 Panasonic Corporation 20-F Annual Report, filed September 13, 2004, at 30, available at http://www.sec.gov/Archives/edgar/data/63271/000119312504155264/d20f.htm Panasonic Corporation 20-F Annual Report, filed September 12, 2005, at 33, available at http://www.sec.gov/Archives/edgar/data/63271/000119312505183432/d20f.htm Panasonic Corporation 20-F Annual Report, filed September 11, 2006, at 34, available at http://www.sec.gov/Archives/edgar/data/63271/000119312506188347/d20f.htm Panasonic Corporation 20-F Annual Report, filed August 30, 2007 at 29, available at http://www.sec.gov/Archives/edgar/data/63271/000119312507192290/d20f.htm The Panasonic Report for Sustainability 2007., at 7-8, 32-33, 35, 38, 40 of 45, available at http://www.corporateregister.com/a10723/mei07-csr-jp.pdf Panasonic Corporation 20-F Annual Report, filed June 30, 2008, at 36, available at http://www.sec.gov/Archives/edgar/data/63271/000119312508143333/d20f.htm Panasonic Corporation 20-F Annual Report filed June 30, 2009, at 22, available at http://www.sec.gov/Archives/edgar/data/63271/000119312509141165/d20f.htm Panasonic Corporation 20-F Annual Report filed June 30, 2010, at 24, available at http://www.sec.gov/Archives/edgar/data/63271/000119312510150553/d20f.htm Panasonic Corporation 20-F Annual Report filed June 30, 2011, at 24, available at http://www.sec.gov/Archives/edgar/data/63271/000119312511178201/d20f.htm Panasonic Corporation 20-F Annual Report filed June 28, 2012, at 24, available at http://www.sec.gov/Archives/edgar/data/63271/000119312512286456/d230958d20f.htm . Panasonic Entities' Objections and Responses to DAP's 1st Set of Requests for Admission, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i> , July 10, 2014 Deposition of Masahiro Kimura, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i> , July 19, 2012 at 66:3-67:4

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		Panasonic Corporation 20-F Annual Report filed September 11, 2006, at 11, 17, 127, available at: http://www.sec.gov/Archives/edgar/data/63271/000119312506188347/d20f.htm
		Panasonic Corporation 20-F Annual Report filed August 30, 2007, at 11, available at: http://www.sec.gov/Archives/edgar/data/63271/000119312507192290/d20f.htm
		Panasonic Corporation 20-F Annual Report filed June 30, 2008, at 14, available at: http://www.sec.gov/Archives/edgar/data/63271/000119312508143333/d20f.htm
		Panasonic Corporation 20-F Annual Report filed June 30, 2009, at 9, available at: http://www.sec.gov/Archives/edgar/data/63271/000119312509141165/d20f.htm
		Toshiba Corp., Annual Report 2003, at 35, 46, available at: http://www.toshiba.co.jp/about/ir/en/finance/ar/ar2003/ar2003e.pdf
		Toshiba Corp., Annual Report 2004, at 20, 43, 55, 74, available at: http://www.toshiba.co.jp/about/ir/en/finance/ar/ar2004/ar2004e.pdf
		Toshiba Corp., Annual Report 2005, at 40, 52, 67, available at: http://www.toshiba.co.jp/about/ir/en/finance/ar/ar2005/ar2005e.pdf
		Toshiba Corp., Annual Report 2006, at 43, 56, 70, available at: http://www.toshiba.co.jp/about/ir/en/finance/ar/ar2006/ar2006e.pdf
		Toshiba Entities' Objections and Responses to DAP's 1st Set of Requests for Admission, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i> , July 10, 2014
		Toshiba Entities' Objections and Responses to DAP's 1st Set of Interrogatories, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i> , July 10, 2014
		Article, "Closure of MT Picture Display (M) Sdn. Bhd.", July 26, 2006, available at: https://www.toshiba.co.jp/about/ir/en/news/20060726.htm
		Article, "Matsushita, Toshiba Advances CRT Joint Venture", March 28, 2003, available at: http://www.twice.com/news/matsushita-toshiba-advances-crt-joint-venture-2
		Notice on European Commission's Decision Concerning the Business of Color Picture Tubes, December 6, 2012, available at: http://www.toshiba.co.jp/about/ir/en/news/20121206.pdf
		Panasonic Defendants' Responses and Objections to DAP's 1st Set of Requests for Admission, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i> , July 10, 2014
		Panasonic Defendants' Responses and Objections to DAP's 1st Set of Interrogatories, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i> , July 10, 2014
		Deposition of Takashi Nakano, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i> , July 13, 2012 at 33:9-37:11; 42:23-43:10
		Deposition of Tatsuo Tobinga, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i> , July 16, 2012 at 18:12-19:2; 21:1-4; 115:20-22
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		Deposition of Huai Sul Chu, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i> , February 11, 2014 at 20:1-2; 126:6-12
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		Panasonic Entities' Objections and Responses to DAP's 1st Set of Interrogatories, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i> , July 10, 2014
		MTPD-0193810; MTPD-0591715-21; MTPD-0599440-5; PC-0021795-805; PC-0021855-65; PC-0021962-6; PC-0022238-40; PC-0022345-50; PC-0022362-63; PC-0022370-71; PC-0022477-79; PC-0022526-32; PC-0022670-3; PC-0022682-5; PC-0022731-2; PC-0022810-2; PC-0022813-6; PC-0022975-94; PC-0023088-108; PC-0023109-18; PC-0023213-4; PC-0023223-33; PC-0023279-301; PC-0023417-8; PC-0023520-21; PC-0023525-9; PC-0023563-7
Panasonic Corporation of North America (f/k/a Matsushita Electric Corporation of America)	Defendant Panasonic Corporation of North America (f/k/a Matsushita Electric Corporation of America) owned and controlled by Defendant Panasonic Corporation (f/k/a Matsushita Electric Industrial Co., Ltd)	See entry for Panasonic Consumer Electronics Co., <i>infra</i> .
	Defendant Panasonic Corporation owned and controlled joint venture Defendant Matsushita Toshiba Picture Display Co., Ltd. (n/k/a MT Picture Display Co., Ltd.)	See entry for Panasonic Consumer Electronics Co., <i>infra</i> .

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	<p>JVC Victor Company of Japan Limited. Annual Report 1998, at 31 and 35 of 36, available at http://www.jvckenwood.co.jp/en/ir/library/annual/data_jvc/ar1998-e_all.pdf</p> <p>JVC Victor Company of Japan, Limited. Annual Report 1999, at 31, and 35 of 36, available at http://www.jvckenwood.co.jp/en/ir/library/annual/data_jvc/ar1999-e_all.pdf</p> <p>JVC Victor Company of Japan, Limited. Annual Report 2000, at 36, 39, of 40, available at http://www.jvckenwood.co.jp/en/ir/library/annual/data_jvc/ar2000-e_all.pdf</p> <p>JVC Victor Company of Japan, Limited. Annual Report 2001, at 45 of 46, available at http://www.jvckenwood.co.jp/en/ir/library/annual/data_jvc/ar2001-e_all.pdf</p> <p>JVC Victor Company of Japan, Limited. Annual Report 2002, at 45 and 48 of 50, available at http://www.jvckenwood.co.jp/en/ir/library/annual/data_jvc/ar2002-e_all.pdf</p> <p>Article, "JVC Announces 3 New Dualmode Digital Cameras: The New GC-A33, GC-A50, AND GC-A55," March 2, 2003, available at: http://www.dcvviews.com/press/JVC_GC-A55.htm</p> <p>JVC Victor Company of Japan Limited. Annual Report 2003, at 55 of 56, available at http://www.jvckenwood.co.jp/en/ir/library/annual/data_jvc/ar2003-e_all.pdf</p> <p>JVC Victor Company of Japan, Limited. Annual Report 2004, at 55, 56, and 58 of 59, available at http://www.jvckenwood.co.jp/en/ir/library/annual/data_jvc/ar2004-e_all.pdf</p> <p>Victor Company of Japan, Ltd.'s Disclosure Statement Pursuant to Rule 7.1, <i>St. Clair Intellectual Property Consultants, Inc. v. Samsung, et. al.</i>, Case 1:04-cv-01436-LPS, C.A. No. 04-1436-JJF, April 20, 2005 (D. Delaware) , available at https://ecf.ded.uscourts.gov/doc/1/0431315571</p> <p>JVC Victor Company of Japan, Limited. Annual Report 2005, at, 57, and 60, available at http://www.jvckenwood.co.jp/en/ir/library/annual/data_jvc/ar2005-e_all.pdf</p> <p>JVC Americas Corporation's Disclosure Statement Pursuant to Rule 7.1, <i>Compression Labs, Inc. v. Agfa Corp., et. al.</i>, Case 2:04-cv-00158-DF, Dkt.. 73, July 28, 2004(E.D. Texas), available at: http://docs.justia.com/cases/federal/district-courts/texas/txedce/2/2004cv00158/84709/73/0.pdf?71188618381</p> <p>JVC Americas Corporation's Disclosure Pursuant to Rule 7.1, <i>Orbsok, L.L.C. v. The DirecTV Group, Inc., et. al.</i>, Case 2:05-cv-00519-TIW, Dkt.. 76, March 17, 2006 (E.D. Texas)</p> <p>JVC Victor Company of Japan, Limited. Annual Report 2006, at 35, and 63 of 64, available at http://www.jvckenwood.co.jp/en/ir/library/annual/data_jvc/ar2006-e_all.pdf</p> <p>Panasonic Entities' Objections and Responses to DAP's 1st Set of Interrogatories, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i> , July 10, 2014</p> <p>JVC Victor Company of Japan, Limited. Annual Report 2007, at 22, 27, and 57 of 60, available at http://www.jvckenwood.co.jp/en/ir/library/annual/data_jvc/ar2007-e_all.pdf</p> <p>JVC America. Company Overview, available at: http://www.jvc.com/company/index.jsp</p>
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JVC Americas Corporation Victor Company of Japan, Ltd. (n/k/a JVC Kenwood Corporation) owned and controlled by Defendant Panasonic Corporation (f/k/a Matsushita Electric Industrial Co., Ltd.)	Article. "Matsushita Will Help Restructure JVC, May 31, 1994, available at: http://www.telecompaper.com/news/matsushita-will-help-restructure-jvc--27379 Victor Company of Japan Limited. Annual Report 1998, at 25 of 36, available at http://www.jvckenwood.co.jp/en/ir/library/annual/data_jvc/ar1998-e_all.pdf JVC Victor Company of Japan, Limited. Annual Report 1999, at 25 of 36, available at http://www.jvckenwood.co.jp/en/ir/library/annual/data_jvc/ar1999-e_all.pdf JVC Victor Company of Japan, Limited. Annual Report 2000, at 28 of 40, available at http://www.jvckenwood.co.jp/en/ir/library/annual/data_jvc/ar2000-e_all.pdf JVC Victor Company of Japan, Limited. Annual Report 2001, at 5, 6, and 34 of 48, available at http://www.jvckenwood.co.jp/en/ir/library/annual/data_jvc/ar2001-e_all.pdf JVC Victor Company of Japan, Limited. Annual Report 2002, at 35 of 50, available at http://www.jvckenwood.co.jp/en/ir/library/annual/data_jvc/ar2002-e_all.pdf JVC Victor Company of Japan Limited. Annual Report 2003, at 45 of 56, available at http://www.jvckenwood.co.jp/en/ir/library/annual/data_jvc/ar2003-e_all.pdf Panasonic Corp. 20-F Annual Report, filed September 10, 2003, at 49, available at http://www.sec.gov/Archives/edgar/data/63271/000119312503047505/d20f.htm JVC Victor Company of Japan, Limited. Annual Report 2004, at 32 and 47 of 61, available at http://www.jvckenwood.co.jp/en/ir/library/annual/data_jvc/ar2004-e_all.pdf Panasonic Corporation. 20-F Annual Report, filed September 13, 2004, at 29, available at http://www.sec.gov/Archives/edgar/data/63271/000119312504155264/d20f.htm JVC Victor Company of Japan, Limited. Annual Report 2005, at 34, and 48 of 62, available at http://www.jvckenwood.co.jp/en/ir/library/annual/data_jvc/ar2005-e_all.pdf Panasonic Corporation. 20-F Annual Report, filed September 12, 2005, at 32, available at http://www.sec.gov/Archives/edgar/data/63271/000119312505183432/d20f.htm JVC Victor Company of Japan, Limited. Annual Report 2006, at 30 and 51 of 64, available at http://www.jvckenwood.co.jp/en/ir/library/annual/data_jvc/ar2006-e_all.pdf Panasonic Corporation. 20-F Annual Report, filed September 11, 2006, at 33, available at http://www.sec.gov/Archives/edgar/data/63271/000119312506188347/d20f.htm JVC Victor Company of Japan, Limited. Annual Report 2007, at 44 of 60, available at http://www.jvckenwood.co.jp/en/ir/library/annual/data_jvc/ar2007-e_all.pdf Panasonic Corporation. 20-F Annual Report, filed August 30, 2007, at 12, 29, available at http://www.sec.gov/Archives/edgar/data/63271/000119312507192290/d20f.htm JVC Victor Company of Japan, Limited. Annual Report 2008, at 18 of 36, available at http://www.jvckenwood.co.jp/en/ir/library/annual/data/jkh_ar_2008_en_fs_jvc.pdf Funding Universe. Victor Company of Japan, Limited History., available at: http://www.fundinguniverse.com/company-histories/victor-company-of-japan-limited-history/ Panasonic Entities' Objections and Responses to DAP's 1st Set of Requests for Admission, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i> , July 10, 2014 Panasonic Entities' Objections and Responses to DAP's 1st Set of Interrogatories, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i> , July 10, 2014 JVC Americas Corp. Disclosure Pursuant to Rule 7.1, International Control Systems, LLC v. Sony Electronics, Inc., et al., Case 2:08-cv-00188-CE, December 22, 2008, (E.D. Texas Marshall Div.) Press Release 7/24/2007 Notice on Capital and Business Alliance and Management Integration for Further Study, Between JVC and Kenwood as well as Third Party Allotment of New Whares of JVC, available at http://panasonic.co.jp/corp/news/official.data/data.dir/en070724-8/en070724-8.html
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		Opinion, <i>JVC Co. of America, Div. of U.S. JVC Corp. v. U.S.</i> , 62 F.Supp.2d 1132 (1999), Slip Op. 99-76, Court No. 93-09-00643, available at: http://www.leagle.com/decision/1999119462fSupp2d1132_11092 Opinion, <i>JVC COMPANY OF AMERICA DIVISION OF US JVC CORPORATION v. UNITED STATES</i> , No. 00-1028, November 21, 2000, available at: http://caselaw.findlaw.com/us-federal-circuit/1493518.html Article, "People on the Move: JVC Company of America Names CEO", October 2008, available at: http://www.dealerscope.com/article/people-move-jvc-company-america-names-ceo-176020/ HifiEngine.com Owners Manuals, Service Manuals, Schematics, "JVC" , available at: http://www.hifiengine.com/library/jvc.shtml Barcodesinc.com, "JVC Surveillance Camera and Surveillance DVR" , available at: http://www.barcodesinc.com/jvc/ Article, "JVC Introduces Portable High Definition Digital Player/Recorder", available at: http://www.creativeplanetnetwork.com/dcp/news/jvc-introduces-portable-high-definition-digital-playerrecorder/39551 Article, "JVCs New Alneo XA-HD500 Portable MP3 Player", October 18, 2005, available at: http://www.ecoustics.com/products/jvcs-new-alneo-xa-hd500-portable/ Article, "JVC TH-L1 5.1 Surround System For Gamers and Home Theater, Too", June 27, 2007, available at: http://gizmodo.com/272744/jvc-th+l1-51-surround-system-for-gamers-and-home-theater-too JVC HD70fh97 HD-LA Television Brochure, at 2, available at: http://www.betterviewing.com/pdf/hd70fh97.pdf
JVC Company of America	JVC Company of America owned and controlled by JVC Americas Corp.	See entry for JVC Americas Corp., <i>infra</i> .
	JVC Americas Corp. owned and controlled by Victor Company of Japan, Ltd. (n/k/a JVC Kenwood Corporation)	See entry for JVC Americas Corp., <i>infra</i> .
	Victor Company of Japan, Ltd. (n/k/a JVC Kenwood Corporation) owned and controlled by co-conspirator Panasonic Corporation (f/k/a Matsushita Electric Industrial Co., Ltd.)	See entry for JVC Americas Corp., <i>infra</i> .
Sanyo North America Corp.	Sanyo North America Corp. owned and controlled by Sanyo Electric Co., Ltd.	Article, "Sanyo Projectors Benefit the Classroom and Lecture Hall with Innovative New Products", June 29, 2010, available at: http://www.hdtvmagazine.com/news/2010/09/sanyo-projectors-benefit-the-classroom-and-lecture-hall-with-innovative-new-products.php Article, "SANYO Announces New Distribution Arrangement for Consumer Batteries", April 6, 2010, available at: http://www.thefreilibrary.com/SANYO+North+America+Corp.+Announces+New+Distribution+Arrangement+for...+a0223200957 Article, "SANYO Opens Plant in Oregon", November 2, 2009, available at: http://www.industryweek.com/companies-amp-executives/sanyo-opens-plant-oregon Article, "Sanyo's 'eneloop bike' runs on batteries and foot power", April 2010, available at: http://www.sandiegometro.com/2010/04/sanyo%20%80%99s-%E2%80%99eneloop-bike%E2%80%99runs-on-batteries-and-foot-power/ Article, "Panasonic To Buy Sanyo", December 24, 2008, available at: https://www.sustainablebusiness.com/index.cfm/go/news.display/id/17373 Panasonic Headquarter News 2008-12-19 (Amend) Panasonic and Sanyo Agree to Capital and Business Alliance, available at http://panasonic.co.jp/corp/news/official.data/data.dir/en081219-7/en081219-7.html Panasonic Press Release 2009-11-4 Panasonic Announces Commencement of Tender Offer for SANYO Shares, available at http://panasonic.co.jp/corp/news/official.data/data.dir/en091104-5/en091104-5-1.pdf Panasonic Press Release 2009-11-25 Panasonic Announces the Extension of the Period of the Tender Offer for SANYO Shares and Other Related Matters, available at http://panasonic.co.jp/corp/news/official.data/data.dir/en091125-5/en091125-5-1.pdf Panasonic Headquarters News 2009-12-21 Sanyo Becomes a Panasonic Company, available at http://panasonic.co.jp/corp/news/official.data/data.dir/en091221-2/en091221-2.html Panasonic Corp. 20-F Annual Report, filed March 31, 2011, at 2, 11-12, 17-18, 28, 34-35, 37-38, 111, 155, available at: http://www.sec.gov/Archives/edgar/data/63271/00011931251178201/d20f.htm Panasonic Corp. 20-F Annual Report, filed March 31, 2012, at 2, 13, 18, 23, 29, 39, 41, 116, available at: http://www.sec.gov/Archives/edgar/data/63271/000119312512286456/d230958d20f.htm
	Sanyo Electric Co., Ltd. owned and controlled by Defendant Panasonic Corp.	

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<p>Philips Consumer Electronics Co. is a subdivision of the Philips Group and is operated as a business division of Defendant Philips Electronics North America Corporation ("PENAC")</p> <p>Philips Group owned and controlled by Defendant Koninklijke Philips Electronics N.V</p> <p>Defendant PENAC owned and controlled by Philips Holding USA Inc.</p> <p>Philips Holding USA Inc. owned and controlled by Defendant Koninklijke Philips Electronics N.V</p> <p>Philips Consumer Electronics Co.</p>	<p>Philips' Entities Objections and Responses to DAP's First Set of Interrogatories, <i>In Re: Cathode Ray Tube (CRT) Litigation</i>, July 10, 2014 Defendant Philips Consumer Electronics, Inc. Disclosure Pursuant to Rule 7.1, Beljico Feliz v. Philips Consumer Electronics, Inc., et. al., Case No. 1:08-cv-07729-DC, Dkt.. No. 12, October 3, 2008 Article, "Company Information" - Koninklijke Philips Electronics N.V., available at: http://topics.nytimes.com/top/news/business/companies/koninklijke_royal_philips_electronics_nv/ Article, "Royal Philips Electronics \$1.5 Billion Notes Offering", March 12, 2012,available at: http://www.davispolk.com/Royal-Philips-Electronics-15-Billion-Notes-Offering-03-12-2012/ Royal Philips 20-F Annual Report dated Feb. 25, 2013,Exhibit 8, "List of Significant Subsidiaries" (no page number), http://www.sec.gov/Archives/edgar/data/313216/000119312513073920/d486581dex8.htm Royal Philips and PENAC Resp. to Dell 1st RFP dated August 30, 2013, "Response to Request No. 1," at 12, Dell Inc., Dell Products L.P., v. PENAC, 3:07-md-5944-SC, (N.D. Cal.) PENAC Corp.'s Objections and Responses to DAP's First Set of Interrogatories, <i>In Re: Cathode Ray Tube (CRT) Litigation</i>, July 10, 2014 Defendant Philips Consumer Electronics, Inc. Disclosure Pursuant to FRCP 7.1, Beljico Feliz v. Philips Consumer Electronics, Inc., et. al., Case No. 1:08-cv-07729-DC, Dkt.. No. 12, October 3, 2008 Royal Philips S-8 dated May 26, 2005, "Statement of Changes in Beneficial Ownership" (no page number), http://www.sec.gov/Archives/edgar/data/313216/000089183604000211/xslF345X02/sc0101-04_ex.xml Royal Philips SC 13d/A dated June 7, 2004, "Information to be Included in Statements Filed Pursuant to Rule 13d-1(a) and Amendments Thereto Files Pursuant to Rule 13d-2(a), http://www.sec.gov/Archives/edgar/data/313216/000089183604000224/sc0105.txt 2006-2-13 Royal Philips 20-F Annual Report, Exhibit 8 "List of significant subsidiaries" 2005-2-22 Royal Philips 20-F Annual Report, Exhibit 8 "List of significant subsidiaries" 2004-2-23 Royal Philips 20-F Annual Report, Exhibit 8 "List of significant subsidiaries" 2003-3-14 Royal Philips 20-F Annual Report, Exhibit 8 "List of significant subsidiaries" 2002-5-2 Royal Philips 20-F Annual Report, Exhibit 8 "List of significant subsidiaries" 2001-5-7 Royal Philips 20-F Annual Report, Exhibit 8, "List of significant subsidiaries" Royal Philips SC 13d/A dated June 7, 2004, "Information to be Included in Statements Filed Pursuant to Rule 13d-1(a) and Amendments Thereto Files Pursuant to Rule 13d-2(a), at 5, http://www.sec.gov/Archives/edgar/data/313216/000089183604000224/sc0105.txt Royal Philips S-8 dated May 26, 2005, "Statement of Changes in Beneficial Ownership" (no page number), http://www.sec.gov/Archives/edgar/data/313216/000089183604000211/xslF345X02/sc0101-04_ex.xml Royal Philips 20-F Annual Report dated Feb. 20, 2007, Exhibit 8, "List of Significant Subsidiaries" (no page number), http://www.sec.gov/Archives/edgar/data/313216/000115697307000251/u51902ex8.htm Royal Philips 20-F Annual Report dated Feb. 19, 2008, Exhibit 8, "List of Significant Subsidiaries" (no page number), http://www.sec.gov/Archives/edgar/data/313216/000115697308000201/u54864ex8.htm Royal Philips 20-F Annual Report dated Feb. 23, 2009, Exhibit 8, "List of Significant Subsidiaries" (no page number) http://www.sec.gov/Archives/edgar/data/313216/000115697309000099/u06127ex8.htm Royal Philips 20-F Annual Report dated 2010-2-22, Exhibit 8, "List of subsidiaries" (no page number) Royal Philips 20-F Annual Report dated Feb. 18, 2011, Exhibit 8, "List of Significant Subsidiaries" (no page number), http://www.sec.gov/Archives/edgar/data/313216/00009501231101545/u10449ex8.htm Royal Philips 20-F Annual Report dated 2012-2-24 Exhibit 8 "List of subsidiaries" (no page number) Royal Philips 20-F Annual Report dated Feb. 25, 2013,Exhibit 8, "List of Significant Subsidiaries" (no page number), http://www.sec.gov/Archives/edgar/data/313216/000119312513073920/d486581dex8.htm Royal Philips 20-F Annual Report dated 2014-2-25, Exhibit 8, "List of Significant Subsidiaries" (no page number) Article, "Philips to Acquire Genlyte, November 26, 2007", available at: http://www.hadco.com/Hadco/Public/content.aspx?hashkey=Philips Philips Entities' Objections and Responses to DAP's First Set of Interrogatories, <i>In Re: Cathode Ray Tube (CRT) Litigation</i>, July 10, 2014 </p>
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	Royal Philips and PENAC Resp. to Dell 1st RFP dated August 30, 2013,"Response to Request No. 1," at 12, Dell Inc.; Dell Products L.P., v. PENAC, 3:07-md-5944-SC, (N.D. Cal.)

	Joint Venture Agreement by and between LG Electronics, Inc. and Koninklijke Philips Electronics N.V., June 11, 2001 (PHLP-CRT-144478-144585), at 15-16.
	Philips Annual Report 2001, at 19, 55-56, available at: http://www.philips.com/shared/assets/Downloadablefile/FinancialStatements_AR01-1324.pdf
	Royal Philips 20-F Annual Report dated May 2, 2002, at 14, 31, available at: http://www.sec.gov/Archives/edgar/data/313216/000115697302000178/u44950e20-f.txt
	Philips Annual Report 2002, at 23, 61, available at: http://www.philips.com/shared/assets/Downloadablefile/AR02-FinancialReport-2243.pdf
	Royal Philips 20-F Annual Report dated March 14, 2003, at 15, available at: http://www.sec.gov/Archives/edgar/data/313216/000115697303000371/u45959e20vt.txt
	Philips Annual Report 2003, at 70, available at: http://www.philips.com/shared/assets/Downloadablefile/FinancialStatements_AR03-2812.pdf
	Royal Philips 20-F Annual Report dated February 23, 2004, at 10, 32, available at: http://www.sec.gov/Archives/edgar/data/313216/000115697304000207/u47131e20vf.htm
	Royal Philips 20-F Amended Annual Report dated April 28, 2005, Exhibit 15(g), at 7, available at: http://www.sec.gov/Archives/edgar/data/313216/000115697305000564/u48648exv15wg.htm
	Philips Annual Review 2004, at 56, available at: http://www.philips.com/shared/assets/Downloadablefile/Philips_AnnualReview2004_2-13731.pdf
	Philips Annual Report 2004, at 40, 128, 150, available at: http://www.philips.com/shared/assets/Downloadablefile/Philips_AnnualReport2004_2-13833.pdf
	Philips Annual Report 2005, at 50, 119, 150, 174, 198, 209, available at: http://www.philips.com/shared/assets/Downloadablefile/AR_2005%283%29-15245.pdf
	Philips Annual Report 2006 at 144, available at: http://www.philips.com/shared/assets/Downloadablefile/Investor/annual-report/Philips2006_AnnualReport.pdf
	Deposition of Mok Hyeon Seong, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i> , July 9, 2012 at 55:3-17; 61:10-14
	Deposition of Thomas Heiser, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i> , March 18, 2014 at 159:5-13
	Deposition of Kyung Tae Kwon, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i> , July 13, 2012 at 40:4-9
	Deposition of Jim Smith, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i> , December 12, 2012 at 74:11-15; 207:14-18; 263:5-11; 366:23-367:7
	Deposition of Duk Chul Ryu, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i> , January 15, 2014 at 51:12-22
	LG Entities' Responses and Objections to DAP's 1st Set of Requests for Admission, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i> , July 10, 2014
	Philips Entities' Responses and Objections to DAP's 1st Set of Requests for Admission, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i> , July 10, 2014
	Deposition of Patrick Canavan, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i> , January 30, 2014 at 50:14-21
	PHLP-CRT-001202-44; PHLP-CRT-002055-76; PHLP-CRT-002306-2481; PHLP-CRT-003077-215; PHLP-CRT-049349-50; PHLP-CRT-136698-744; PHLP-CRT-138683-95; LGCF00091824-36 LPD-NL00126762-64; LPD-NL00128880-3; LPD-NL00201824-9; BMCC-CRT000006565-6
	See entry for LG Electronics USA, Inc., <i>infra</i> .

	Defendant LG.Philips [International] owned and controlled by LG.Philips Displays Holding B.V. (n/k/a LP Displays)

Philips Electronics North America Corporation ("PENAC")	Defendant PENAC owned and controlled by Philips Holding USA Inc.	See entry for Philips Consumer Electronics Co., <i>infra</i> .
	Philips Holding USA, Inc. owned and controlled by Defendant Koninklijke Philips Electronics N.V.	See entry for Philips Consumer Electronics Co., <i>infra</i> .
	Joint venture LG.Philips Displays Holding B.V. owned and controlled by Defendant Koninklijke Philips Electronics N.V.	See entry for Philips Consumer Electronics Co., <i>infra</i> .
	Defendant LG.Philips [International] owned and controlled by LG.Philips Displays Holding B.V. (n/k/a LP Displays)	See entry for LG Electronics USA, Inc., <i>infra</i> .

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	Samsung 1998 Annual Report at 45, 65 of 66, available at http://www.samsung.com/us/aboutsamsung/investor_relations/financial_information/annual_reports_1998.html
	Samsung 1999 Annual Report at 56, 81 of 83, available at http://www.samsung.com/us/aboutsamsung/investor_relations/financial_information/annual_reports_1999.html
	Samsung 2000 Annual Report at 62, 85 of 88 available at http://www.samsung.com/us/aboutsamsung/investor_relations/financial_information/annual_reports_2000.html
	Samsung Electronics Co. Ltd.'s Audit Report 2001 dated March 13, 2002 at 23 of 48, available at http://www.sec.gov/Archives/edgar/vprr/02/999999997-02-022823
	Samsung Electronics Co. Ltd.'s Audit Report 2002 dated May 6, 2003 at 22, 26, 31, 32, 56 of 62, available at http://www.sec.gov/Archives/edgar/vprr/03/999999997-03-020649
	Samsung Electronics Co. Ltd.'s Audit Report 2004 dated May 4, 2005 at 27, 31 of 63, available at http://www.sec.gov/Archives/edgar/vprr/05/999999997-05-022445
	Samsung Electronics Co. Ltd.'s Audit Report 2005 dated May 1, 2006 at 31, 36, 44, 65 of 73, available at http://www.sec.gov/Archives/edgar/vprr/06/999999997-06-017635
	Samsung 2005 Annual Report at 87, 146 of 148 available at http://www.samsung.com/us/aboutsamsung/investor_relations/financial_information/annual_reports_2005.html
	Samsung 2006 Annual Report at 85, 152 of 154 available at http://www.samsung.com/us/aboutsamsung/investor_relations/financial_information/annual_reports_2006.html
	Samsung Electronics Co. Ltd.'s Audit Report 2006 dated April 4, 2007 at 29, 33l, 39, 41 , 63, 66 of 77, available at http://www.sec.gov/Archives/edgar/vprr/07/999999997-07-016335
	Samsung 2007 Annual Report at 80, 84, 138 of 140 available at http://www.samsung.com/us/aboutsamsung/investor_relations/financial_information/annual_reports_2007.html
	Samsung Electronics Co. Ltd.'s Audit Report 2007 dated April 4, 2007 at 18, 22, 80-81, 84 of 95 (96-196 is duplicate), available at http://www.sec.gov/Archives/edgar/vprr/08/999999997-08-022661
	Samsung 2008 Annual Report at 42, 61, 64 , 104 of 106 available at http://www.samsung.com/us/aboutsamsung/investor_relations/financial_information/annual_reports_2008html
	Samsung Electronics Co. Ltd.'s Audit Report 2008 dated March 30 at 30-37, 56, 61 of 69, available at http://www.sec.gov/Archives/edgar/vprr/09/999999997-09-013805
	Samsung Electronics Co., Ltd. Annual Report 2009 at 49, available at http://japan.samsung.com/aboutsamsung/electronics/images/2009.pdf
	Samsung Electronics Co., Ltd. Annual Report 2010, available at http://www.samsung.com/us/aboutsamsung/ir/financialinformation/annualreport/downloads/2010/SECAR2010_Eng_Final.pdf
	Samsung Electronics Co., Ltd. Annual Report 2011 at 40, available at http://www.samsung.com/us/aboutsamsung/ir/financialinformation/annualreport/downloads/2011/SECAR2011_Eng_Final.pdf
	Samsung Electronics Co., Ltd. Annual Report 2012 at 28, available at http://www.samsung.com/us/aboutsamsung/investor_relations/financial_information/downloads/2013/SECAR2012_Eng_Final.pdf
	Samsung Entities' Responses to Dell Plaintiffs 2d Set of Requests for Admission, In Re: Cathode Ray Tube (CRT) Antitrust Litigation, January 17, 2014
	Deposition of Steve Panoian, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i> , July 17, 2012 at 26:19- 27:8
	Expert Report of Stephen Haggard (dated April 15, 2014) and all documents referred to therein.

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Defendant Samsung SDI Co., Ltd. , owned and controlled by Samsung Electronics Co. Ltd. .	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr><td>Samsung Electronics Co., Ltd. 1999 Annual Report at 70 of 83, available at http://www.samsung.com/us/aboutsamsung/investor_relations/financial_information/annual_reports_1999.html</td></tr> <tr><td>Samsung Electronics Co., Ltd. 2000 Annual Report at 63, 74 of 88 available at http://www.samsung.com/us/aboutsamsung/investor_relations/financial_information/annual_reports_2000.html</td></tr> <tr><td>Samsung Electronics Co., Ltd.'s Audit Report 2001 dated March 13, 2002 at 25, 42 of 48, available at http://www.sec.gov/Archives/edgar/vprr/02/9999999997-02-022823</td></tr> <tr><td>Samsung Electronics Co., Ltd.'s Audit Report 2002 dated May 6, 2003 at 30-32, 56 of 62, available at http://www.sec.gov/Archives/edgar/vprr/03/9999999997-03-020649</td></tr> <tr><td>Samsung Electronics Co., Ltd.'s Audit Report 2004 dated May 4, 2005 at 42, 44, 46, 65 of 72, available at http://www.sec.gov/Archives/edgar/vprr/05/9999999997-05-022445</td></tr> <tr><td>Samsung Electronics Co., Ltd.'s Audit Report 2005 dated May 1, 2006 at 30, 35, 39, 41-45, 64 of 73, available at http://www.sec.gov/Archives/edgar/vprr/06/9999999997-06-017635</td></tr> <tr><td>Samsung Electronics Co., Ltd. 2005 Annual Report at 104-106, 108, 127 of 148 available at http://www.samsung.com/us/aboutsamsung/investor_relations/financial_information/annual_reports_2005.html</td></tr> <tr><td>Samsung Electronics Co., Ltd.'s Audit Report 2006 dated April 4, 2007 at 28, 32, 37, 39-43, 67-68 of 77, available at http://www.sec.gov/Archives/edgar/vprr/07/9999999997-07-016335</td></tr> <tr><td>Samsung Electronics Co., Ltd. 2006 Annual Report at 89, 102-106, 126-128 of 154 available at http://www.samsung.com/us/aboutsamsung/investor_relations/financial_information/annual_reports_2006.html</td></tr> <tr><td>Samsung Electronics Co., Ltd. 2007 Annual Report at 98-102, 125-126 of 140 available at http://www.samsung.com/us/aboutsamsung/investor_relations/financial_information/annual_reports_2007.html</td></tr> <tr><td>Samsung Electronics Co., Ltd.'s Audit Report 2007 dated April 4, 2007 at 44-45, 47-50, 82 of 95 (96-196 is duplicate), available at http://www.sec.gov/Archives/edgar/vprr/08/9999999997-08-022661</td></tr> <tr><td>Samsung Electronics Co., Ltd.'s Audit Report 2008 dated March 30 at 30-33, 35-36, 60, 62 of 69, available at http://www.sec.gov/Archives/edgar/vprr/09/9999999997-09-013805</td></tr> <tr><td>Samsung Electronics Co., Ltd. 2008 Annual Report at 76-77, 94-95 of 106 available at http://www.samsung.com/us/aboutsamsung/investor_relations/financial_information/annual_reports_2008.html</td></tr> <tr><td>Samsung SDI- Shareholders and Investors, available at: http://www.samsungsdi.com/sustain/s2_2.jsp</td></tr> <tr><td>Samsung Entities' Responses to Dell Plaintiffs 2d Set of Requests for Admission, In Re: Cathode Ray Tube (CRT) Antitrust Litigation, January 17, 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Electronics Co., Ltd. 2007 Annual Report at 98-102, 125-126 of 140 available at http://www.samsung.com/us/aboutsamsung/investor_relations/financial_information/annual_reports_2007.html	Samsung Electronics Co., Ltd.'s Audit Report 2007 dated April 4, 2007 at 44-45, 47-50, 82 of 95 (96-196 is duplicate), available at http://www.sec.gov/Archives/edgar/vprr/08/9999999997-08-022661	Samsung Electronics Co., Ltd.'s Audit Report 2008 dated March 30 at 30-33, 35-36, 60, 62 of 69, available at http://www.sec.gov/Archives/edgar/vprr/09/9999999997-09-013805	Samsung Electronics Co., Ltd. 2008 Annual Report at 76-77, 94-95 of 106 available at http://www.samsung.com/us/aboutsamsung/investor_relations/financial_information/annual_reports_2008.html	Samsung SDI- Shareholders and Investors, available at: http://www.samsungsdi.com/sustain/s2_2.jsp	Samsung Entities' Responses to Dell Plaintiffs 2d Set of Requests for Admission, In Re: Cathode Ray Tube (CRT) Antitrust Litigation, January 17, 2014	Samsung 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Thomson Consumer Electronics Inc. (n/k/a Technicolor USA Inc.)	Thomson Consumer Electronics Inc. owned and controlled by Technicolor SA (f/k/a Thomson SA)	<p>Thomson Group 20-F Annual Report, filed May 30, 2003, at 105, F-33, F-70, available at: http://www.sec.gov/Archives/edgar/data/1080259/000095016803002013/d20f.htm</p> <p>Thomson Group 20-F Annual Report, filed June 29, 2004, at F-75 ,available at: http://www.sec.gov/Archives/edgar/data/1080259/000119312504111361/d20f.htm</p> <p>Thomson Group 20-F Annual Report, filed June 3, 2005, at F-84, available at: http://www.sec.gov/Archives/edgar/data/1080259/00011709970500025/form20f.htm</p> <p>Thomson Group 20-F Amended Annual Report, filed December 22, 2005, at F-84, available at: http://www.sec.gov/Archives/edgar/data/1080259/00011709970500025/m20f.htm</p> <p>Thomson Group 20-F Annual Report, filed May 12, 2006, at F-143, available at: http://www.sec.gov/Archives/edgar/data/1080259/000130817906000089/thomson.htm</p> <p>Thomson Group 20-F Amended Annual Report, filed June 21, 2006, at F-143, available at: http://www.sec.gov/Archives/edgar/data/1080259/000130817906000106/thomson20fa.htm</p> <p>Thomson Group 20-F Annual Report, filed May 11, 2007, at F-91, available at: http://www.sec.gov/Archives/edgar/data/1080259/000130817907000089/th00620f06.htm</p> <p>Thomson Group 20-F Amended Annual Report, filed July 24, 2007, at F-91, available at: http://www.sec.gov/Archives/edgar/data/1080259/000130817907000119/th00620f06/complet.htm</p> <p>Thomson Group 20-F Annual Report, filed April 21, 2008, at 147, 275, available at: http://www.sec.gov/Archives/edgar/data/1080259/000130817908000046/thomson20f.htm</p> <p>Thomson 2008 20-F at 151, available at http://www.technicolor.com/en/who-we-are/investor-center</p> <p>Technicolor 2010-4-6 20-F at 128, available at http://www.technicolor.com/en/who-we-are/investor-center</p> <p>Technicolor Annual Report 2010 at 134, available at http://www.technicolor.com/en/who-we-are/investor-center</p> <p>Technicolor Annual Report 2011 at 128, available at http://www.technicolor.com/en/who-we-are/investor-center</p> <p>Technicolor, Annual Report 2012, at 132-133, 219, 234, 242, 258, available at: http://interactivedocument.labradorcompany.com/Labrador/EN/Technicolor/AnnualReport2012/?Page=244</p> <p>Technicolor Annual Report 2013 at 152, available at http://www.technicolor.com/en/who-we-are/investor-center</p> <p>Environmental Response and Revitalization Site Summary, RCA Corporation, March 2014,available at: http://www.epa.ohio.gov/cdo/rca.aspx</p> <p>Mergent Industrial, Technicolor SA, January 28, 2014, at 2, available at: http://www.mergent.com/docs/joans-new-companies/technicolor-sa-1-28-2014.pdf?sfvrsn=0</p> <p>U.S. Congress, Making things better : competing in manufacturing, DIANE Publishing, Copyright 1990, at 87-88, available at: http://books.google.com/books?id=sfpdn4YX0flC&lg=PA87&ots=5bKzvLYFNy&dq=%22thomson%20consumer%20electronics%22%20subsidiary&pg=PA87#v=onepage&q=%22thomson%20consumer%20electronics%22%20subsidiary&t=false</p>
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	Toshiba Corp. Annual Report 2000 at 45, available at http://www.toshiba.co.jp/about/ir/en/finance/ar/ar2000.htm
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	Toshiba Corp. Annual Report 2003 at 35, available at http://www.toshiba.co.jp/about/ir/en/finance/ar/ar2003.htm
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	Toshiba Corp., Annual Report 2005 at 52, available at http://www.toshiba.co.jp/about/ir/en/finance/ar/ar2005/ar2005e.pdf
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	Toshiba Corp. Annual Report 2008 at 78, available at http://www.toshiba.co.jp/about/ir/en/finance/ar/ar2008.htm
	Toshiba Corp. Annual Report 2009 at 64, available at http://www.toshiba.co.jp/about/ir/en/finance/ar/ar2009.htm
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	Toshiba Corp. Annual Report 2012 at 80, available at http://www.toshiba.co.jp/about/ir/en/finance/ar/ar2012/ar2012e.pdf
	Toshiba Corp Annual Report 2013 at 82, available at http://www.toshiba.co.jp/about/ir/en/finance/ar/ar2013/ar2013e.pdf
	Toshiba Entities' Objection and Responses to DAP's 1st Set of Requests for Admission, <i>In Re Cathode Ray (CRT) Antitrust Litigation</i> , July 10, 2014
	Toshiba Entities' Objections and Responses to DAP's 1st Set of Requests for Admission, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i> , July 10, 2014
Toshiba America, Inc. owned and controlled by Defendant Toshiba Corporation	Toshiba America Information Systems, Inc. Corporate Disclosure Statement Pursuant to Rule 7.1 in <i>MicroInk, LLC v. Intel Corp., et al.</i> , Case 2:07-cv-00488-MHS, March 6, 2008. (E.D. Texas)
	Toshiba America Information Systems, Inc. Corporate Disclosure Statement Pursuant to Rule 7.1 in <i>Typhoon Touch Technologies v. Dell, Inc. et al.</i> , August 20, 2008, Case: 6:07-cv-00546 LED (E.D. Texas).
	Toshiba America, Inc. and Toshiba America Information Systems, Inc., Corporate Disclosure Statement Pursuant to Rule 7.1 in <i>Northpeak Wireless LLC v. 3Com Corporation, et al.</i> , Case 5:08-cv-01813-IPJ, October 27, 2008 (N. D. Alabama, Northeast Division)
	Toshiba America, Inc. Corporate Disclosure Statement Pursuant to Rule 7.1 in <i>Magsil Corporation and Massachusetts Institute of Technology v. Seagate Technology et al., Case 1:08-cv-00940-HB</i> , February 2, 2009 (D. Delaware).
	Toshiba America Information Systems, Inc. Corporate Disclosure Statement Pursuant to Rule 7.1 in <i>Xpoint Technologies, Inc. v. Intel Corporation, et al.</i> , Case 1:09-cv-00026-SLR, June 1, 2009 (D. Delaware).
	Toshiba America Information Systems, Inc. Corporate Disclosure Statement Pursuant to Rule 7.1 in <i>Innovative Biometric Technology, LLC v. Lenovo (United States), Inc. et al.</i> , Case 9:09-cv-81046-KLR, December 14, 2010 (S.D. Fla.)
	Toshiba America Information Systems, Inc. Corporate Disclosure Statement Pursuant to Rule 7.1 in <i>Walker Digital, LLC v. Ayre Acoustics, Inc., et al.</i> , Case 1:11-cv-00321-LPS, Corporate Disclosure, June 10, 2011 (D. Delaware)
	Toshiba America, Inc. Certificate of Interested Persons and Corporate Disclosure Statement Pursuant to Rule 7.1 in <i>Brandywine Communications Technologies, LLC v. Toshiba Corporation and Toshiba America, Inc.</i> , Case 6:11-cv-01856-CEH-DAB, December 16, 2011 (M.D. Fla.)
	Toshiba America Information Systems, Inc. Corporate Disclosure Statement Pursuant to Rule 7.1 in <i>FastVDO, LLC v. Apple, Inc., et al.</i> , Case 1:11-cv-00797-RGA, December 19, 2011 (D. Delaware)
	Toshiba Corporation et. al. Statement Pursuant to Rule 7.1 in <i>HSM Portfolio LLC and Technology Properties Limited LLC v. Fujitsu Limited, et. al.</i> , Case 1:11-cv-00770-RGA, Dkt. 161, January 18, 2012. (D. Delaware)
	Toshiba America Information Systems Inc., et. al. Corporate Disclosure Statement Pursuant to Rule 7.1 in <i>Ipventure, Inc. v. Acer, Inc., et al.</i> , Case 1:11-cv-00588-RGA, Dkt. 87, March 12, 2012, (D. Delaware).
	Toshiba Corporation Corporate Disclosure Statement Pursuant to Rule 7.1 in <i>Graphics Properties Holdings, Inc. v. Toshiba America Information Systems Inc., et al.</i> , May 14, 2012, at 1, Case 1:12-cv-00213-LPS, Dkt. 10, (D. Delaware).
	Toshiba Entities' Motion for Partial Summary Judgment under Illinois Brick in <i>In Re TFT-LCD (Flat Panel) Antitrust Litigation</i> , MDL No. 1827, Dkt. 3575, September 9, 2011 (N.D. Cal.)
	Deposition of Koji Kurosawa, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i> , July 30, 2012 at 123:24- 124:4
	Deposition of Richard Huber, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i> , August 1, 2012 at 86:3-9
	Deposition of Jay Alan Heinecke, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i> , July 31, 2012 at 158:10-18
	Inside Toshiba, available at: http://www.toshiba.com/tai/about_us.jspx

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<p>Defendant Toshiba Corporation owned and controlled joint venture Defendant Matsushita Toshiba Picture Display Co., Ltd. (n/k/a MT Picture Display Co., Ltd.)</p>	<p>Panasonic Corporation 20-F Annual Report filed September 13, 2004, at 12, 22, available at: http://www.sec.gov/Archives/edgar/data/63271/000119312504155264/d20f.htm</p> <p>Panasonic Corporation 20-F Annual Report filed September 12, 2005, at 12, 18, 126, available at http://www.sec.gov/Archives/edgar/data/63271/000119312505183432/d20f.htm</p> <p>Panasonic Corporation 20-F Annual Report filed September 11, 2006, at 11, 17, 127, available at http://www.sec.gov/Archives/edgar/data/63271/000119312506188347/d20f.htm</p> <p>Panasonic Corporation 20-F Annual Report filed August 30, 2007, at 11, available at http://www.sec.gov/Archives/edgar/data/63271/000119312507192290/d20f.htm</p> <p>Panasonic Corporation 20-F Annual Report filed June 30, 2008, at 14, available at http://www.sec.gov/Archives/edgar/data/63271/000119312508143333/d20f.htm</p> <p>Panasonic Corporation 20-F Annual Report filed June 30, 2009, at 9, available at http://www.sec.gov/Archives/edgar/data/63271/000119312509141165/d20f.htm</p> <p>Toshiba Corp., Annual Report 2003, at 35, 46, available at http://www.toshiba.co.jp/about/ir/en/finance/ar/ar2003/ar2003e.pdf</p> <p>Toshiba Corp., Annual Report 2004, at 20, 43, 55, 74, available at http://www.toshiba.co.jp/about/ir/en/finance/ar/ar2004e.pdf</p> <p>Toshiba Corp., Annual Report 2005, at 40, 52, 67, available at http://www.toshiba.co.jp/about/ir/en/finance/ar/ar2005/ar2005e.pdf</p> <p>Toshiba Corp., Annual Report 2006, at 43, 56, 70, available at http://www.toshiba.co.jp/about/ir/en/finance/ar/ar2006/ar2006e.pdf</p> <p>Business Integration Contract between Matsushita Electric Industrial Co., Ltd. and Toshiba Corporation, January 29, 2003 (TSB-CRT-00018162)</p> <p>Toshiba Press Release 2003-1-29 Matsushita and Toshiba Announce Outline of New CRT Joint Venture, available at http://www.toshiba.co.jp/about/press/2003_01/pr2902.htm</p> <p>Article, "Matsushita, Toshiba Advances CRT Joint Venture", March 28, 2003, available at: http://www.twice.com/news/matsushita-toshiba-advances-crt-joint-venture-2</p> <p>Notice on European Commission's Decision Concerning the Business of Color Picture Tubes, December 6, 2012, available at: http://www.toshiba.co.jp/about/ir/en/news/20121206.pdf</p> <p>Deposition of Takashi Nakano, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i>, July 13, 2012 at 33:9-37:11; 42:23-43:10</p> <p>Deposition of Tatsuo Tobinaga, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i>, July 16, 2012 at 18:12-19:2; 21:1-4; 115:20-22</p> <p>Deposition of Ayumu Kinoshita, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i>, February 5, 2013 at 36:4-7</p> <p>Deposition of Hui Sul Chu, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i>, February 11, 2014 at 20:1-2; 126:6-12</p> <p>Toshiba Entities' Objections and Responses to DAP's 1st Set of Interrogatories, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i>, July 10, 2014</p> <p>Toshiba Entities' Objections and Responses to DAP's 1st Set of Requests for Admission, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i>, July 10, 2014</p> <p>Panasonic Defendants' Objections and Responses to DAP's 1st Set of Requests for Admission, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i>, July 10, 2014</p> <p>Article, "Closure of MT Picture Display (M) Sdn. Bhd.", July 26, 2006, available at: https://www.toshiba.co.jp/about/ir/en/news/20060726.htm</p>
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		Toshiba America Consumer Products, LLC Corporate Disclosure Statement Pursuant to Rule 7.1 in <i>Digital Choice of Texas, LLC v. Sichuan Changhong Electronic Co., LTD, et al.</i> , Case 2:05-cv-00195-TJW, Dkt. 57, July 15, 2005 (E.D. Texas)
		Toshiba Corporation Corporate Disclosure Statement Pursuant to Rule 7.1 in <i>Donald Ersler v. Toshiba America, Inc. et. al.</i> , Case 1:07-cv-02304-SMG, Dkt. 7, August 8, 2007 (E.D.N.Y.)
		Toshiba America Consumer Products, LLC Corporate Disclosure Statement Pursuant to Rule 7.1 in <i>Lawrence Mann and Robert Stewart v. Toshiba America Consumer Products, L.L.C. and Toshiba America, Inc.</i> , Case 2:07-cv-03854-JAG-MCA, Dkt. 8, October 30, 2007 (D.C. N.J.)
		Toshiba America Consumer Products, LLC Corporate Disclosure Statement Pursuant to Rule 7.1 in <i>Bradley J. Kreisler v. Toshiba America Consumer Products, L.L.C. and Toshiba Corporation</i> , Case 3:08-cv-00260-JPG-CJP, Dkt. 10, May 9, 2008 (S.D. Illinois)
		Toshiba America Consumer Products, LLC Corporate Disclosure Statement Pursuant to Rule 7.1 in <i>Jason Asp v. Toshiba America Consumer Products, LLC</i> , Case 2:08-cv-00427-JDH-TPK, Dkt. 8, July 14, 2008 (S.D. Ohio)
		Toshiba America, Inc. Corporate Disclosure Statement Pursuant to Rule 7.1 in <i>Anvik Corporation v. IPS Alpha Technology, Ltd. et al.</i> , Case 1:08-cv-04036-AKH-LMS, Dkt. 04, July 31, 2008 (S.D.N.Y.)
		Corporate Disclosure Statement Pursuant to Rule 7.1 in <i>Promote Innovation LLC v. Toshiba Corporation et al.</i> , Case 2:10-cv-00100-TJW, Dkt. 38, June 21, 2010 (E.D. Texas)
		Inside Toshiba, available at: http://www.toshiba.com/tai/about_us.jsp
		Article, "Toshiba America Consumer Products Selects Waggener Edstrom Worldwide as Agency of Record for North America Consumer Products", June 10, 2009, available at: http://www.prnewswire.com/news-releases/toshiba-america-consumer-products-selects-waggener-edstrom-worldwide-as-agency-of-record-for-north-america-consumer-products-62080357.html
		Article, "OSHIWA'S REGZA® TV WINS FIRST-EVER PC MAGAZINE GREENTECH HDTV AWARD", December 4, 2008, available at: http://www.meretcinteractive.com/recycling/42xv540award.html
		Article, "Toshiba Announces Innovative Campaign With Dark Horse Comics and USA TODAY", June 16, 2010, available at: http://www.redorbit.com/news/entertainment/1880250/toshiba_announces_innovative_campaign_with_dark_horse_comics_and_usa/#GvrFuBy1jt2pEU.99
		Toshiba Entities' Objections and Responses to DAP's 1st Set of Requests for Admission, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i> , July 10, 2014.
		Toshiba Entities' Objections and Responses to DAP's 1st Set of Interrogatories, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i> , July 10, 2014
		Article, "Toshiba America Consumer Products Announces Appointment of Atsushi Murasawa as President and CEO", April 13, 2009, available at: http://www.bloomberg.com/apps/news?pid=newsarchive&sid=aVs3umcwfU
		Toshiba America, Inc. owned and controlled by Defendant Toshiba Corporation
		See entry for Toshiba America, Inc., <i>infra</i> .
		Defendant Toshiba Corporation owned and controlled joint venture Defendant Matsushita Toshiba Picture Display Co., Ltd. (n/k/a MT Picture Display Co., Ltd.)
		See entry for Toshiba America, Inc., <i>infra</i> .

Toshiba America Information Systems, Inc.	Toshiba America Information Systems, Inc. owned and controlled by Toshiba America, Inc.	Article, "Toshiba America Information Systems Deploys Oracle® Applications to Provide a "Flexible Foundation for the Future", May 1, 2006, available at: http://www.oracle.com/us/corporate/press/016616_EN
		Press Release, "Toshiba Upgrades Kirabook with 4th Generation Intel Processors", 2014, available at: http://www.toshibapresscenter.com/press-releases/toshiba_upgrades_Kirabook.pdf
		Press Release, "Toshiba Appoints New National Sales Manager", May 20, 2005, available at: http://www.toshibacameras.com/news/pr-pr-05202005.pdf
		Article, "Toshiba and GreatAmerica Form Strategic Relationship To Deliver Financing Strategies for Toshiba Telecom and VoIP Systems", November 16, 2004, available at: http://www.greatamerica.com/news/toshiba-and-greatamerica-form-strategic-relationship-to-deliver-financing-strategies-for-toshiba-telecom-and-voip-systems.aspx
		Article, "Toshiba America Information Systems Inc. Names New President", June 23, 1997, available at: http://www.eetimes.com/document.asp?doc_id=1210590
		TAIS Job Posting, "Senior Attorney", Undated, available at: http://www.ocbar.org/Portals/0/pdf/JOB-TAISseniorAttorney.pdf
		Toshiba Entities' Objections and Responses to DAP's 1st Set of Requests for Admission, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i> , July 10, 2014
		Toshiba Entities' Objections and Responses to DAP's 1st Set of Interrogatories, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i> , July 10, 2014
		Deposition of Yoshiaki Uchiyama, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i> , August 1, 2012 at 12:5-7
		Deposition of Richard Huber, <i>In Re: Cathode Ray (CRT) Antitrust Litigation</i> , August 1, 2012 at 85:18-86:2
		Toshiba America, Inc. owned and controlled by Defendant Toshiba Corporation
		See entry for Toshiba America, Inc., <i>infra</i> .
		Defendant Toshiba Corporation owned and controlled joint venture Defendant Matsushita Toshiba Picture Display Co., Ltd. (n/k/a MT Picture Display Co., Ltd.)
		See entry for Toshiba America, Inc., <i>infra</i> .

EXHIBIT B

In Re: Cathode Ray Tube (CRT) Antitrust Litigation

Expert Report of Vandy Howell, Ph.D.

Prepared for Hitachi, Ltd., Hitachi Displays, Ltd. (n/k/a Japan Display Inc.),
Hitachi Asia, Ltd., Hitachi America, Ltd., and Hitachi Electronic Devices (USA)

April 15, 2014

12. Third, because my analysis focuses on the period after the Hitachi Defendants' final closure of their CDT and CPT production lines by April 2002, I specifically analyzed the transaction-level data in order to determine the precise details of the CDT and CPT sales transactions for each Hitachi Defendant subsequent to plant closure. I examined the final sales transactions for each Hitachi Defendant, including the many descriptive variables in the datasets, such as the customers served, the date the purchase orders were placed, the date the products were shipped, the countries to which the products were shipped, and other variables indicating the type of transaction.⁹

13. I have also reviewed industry data and derived the Hitachi Defendants' share of worldwide CDT and CPT sales. For this calculation, I started with the quarterly sum of the Hitachi Defendants' CDT and CPT shipments. Next, I collected total worldwide annual CDT and CPT shipments reported by Fuji Chimera and estimated quarterly industry shipments.¹⁰ I then calculated the Hitachi Defendants' share of worldwide industry sales in each quarter by dividing their quarterly shipments by the estimated quarterly industry sales. The results are presented in detailed graphs. *See* Exhibits 2C and 3C–D below.

14. Finally, after synthesizing the transaction-level data to analyze the Hitachi Defendants' exit from the CRT industry, I applied my expertise in industrial organization and the related academic literature to determine whether the Hitachi Defendants could have affected prices for CRTs after the closure of all CRT production lines by 2002 through the end of the class period.

IV. Summary of Opinions

15. All of the Hitachi Defendants exited the CDT and CPT industries (*i.e.*, ceased both manufacturing and sales) by no later than March 2003. Shortly after the Hitachi Defendants publicly announced their exit from CDT and CPT manufacturing worldwide in 2001 and 2002, the Hitachi Defendants closed their only remaining CDT and CPT production lines and stopped

⁹ For example, the TNO field in HDP-CRT00018516 indicates whether a transaction represents a return. For a description of the information captured in the TNO field, *see* letter from Morgan Lewis to Andrus Anderson, 9/14/2012, responses to Questions 16-20 on HDP-CRT00018516-T, "Electric Data" tab.

¹⁰ *See* Flat Panel Display Applications: Trends and Forecasts, Fuji Chimera Research Institute, Annual Reports, 2000–2007. Quarterly industry sales are estimated as one fourth of total industry annual sales for the year in which the quarter occurred.

producing such tubes globally.¹¹ Very few sales were made after production ceased. These sales were related to servicing existing orders for a limited set of historically-large customers.

- **Exit from the CDT Industry:** HTL stopped manufacturing CDTs in December 2001, when it closed its final CDT production lines in Japan, Singapore and Malaysia. HAS, HAL, HED(US) and HDP never manufactured CDTs. HED(US)'s final CDT sale took place on August 28, 2000 and none of the Hitachi Defendants sold any CDTs to the United States after 2001. HAS's final CDT sale took place in June 2002, and the last revenue-earning CDT sale by HTL took place on October 24, 2002. After October 2002, none of the Hitachi Defendants recorded any revenue-earning CDT sales and all remaining CDT transactions were returns from customers and represented negative revenue.¹² See Section V.B.1 below.
- **Exit from the CPT Industry:** HTL stopped manufacturing CPTs in October 1998. HED(US) stopped manufacturing CPTs in April 2002. HAS, HAL and HDP never manufactured CPTs. HTL's final CPT sale took place in September 2002, and the final HED(US) CPT sales transaction was recorded on March 20, 2003. See Section V.B.2 below.

16. After exiting the CDT and CPT industries by March 2003, the Hitachi Defendants did not have the ability or incentive to affect prices for CDTs or CPTs and their economic incentives were no longer consistent with the objectives of the alleged conspiracy (*i.e.*, to raise the market price of CRTs):

- The Hitachi Defendants did not participate in the CDT and CPT marketplaces after October 2002 and March 2003, respectively, either producing or selling. Because of this, they clearly could not impact prices for those products after that time. After March 2003, the Hitachi Defendants also had no ability to affect CRT prices by participating in the alleged cartel mechanisms, such as market share or customer allocation, because they had no production capacity, no inventory, and no sales.

¹¹ The words "manufacturing" and "production" are used interchangeably throughout the report and are equivalent.

¹² The term "revenue-earning" refers to positive revenue transactions, which represent sales to customers and excludes transactions representing returns, discounts or other deductions.

- The Hitachi Defendants lost the ability to impact prices well before this March 2003 date. A very small competitor with little production capacity can rarely influence prices in an industry. The extent to which it can impact prices depends chiefly on its production capacity. The Hitachi Defendants' production capacity was zero for both CDTs and CPTs by April 2002. From this point in time through the end of the class period in 2007, the Hitachi Defendants could not affect prices for CDTs or CPTs because they both had no CDT or CPT production capacity and only made a very small number of sales to the marketplace until March 2003, when they stopped selling these products. *See* Section VI.B below.
- By March 2003, after exiting the CDT and CPT industries, the Hitachi Defendants no longer had economic incentives consistent with those of the alleged cartel. The Hitachi Defendants made no CDT or CPT sales, had no inventory of CDTs or CPTs to sell, and had no CDT or CPT production capacity that would allow them to benefit from higher CDT and CPT prices. *See* Section VI.C below.

V. All of the Hitachi Defendants Exited the CDT and CPT Industries by March 2003

17. In this section, using the Hitachi Defendants' CDT and CPT sales data produced in this litigation, I analyze the amount and nature of the Hitachi Defendants' CDT and CPT sales in the years surrounding their CDT and CPT production line closures.¹³ First, I describe the Hitachi Defendants' involvement in CDT and CPT production and sales. Second, I present the progression of the Hitachi Defendants' CDT and CPT sales through their last sale and exit from each of these industries.

18. My analysis of the data shows that all of the Hitachi Defendants were entirely out of the CDT and CPT industries by March 20, 2003. The Hitachi Defendants publicly announced their exit from the CDT industry in July 2001 and from the CPT industry in February 2002, citing weak demand for CDTs and CPTs and difficulties in achieving cost savings and profitability.¹⁴

¹³ Throughout the report, sales will refer to gross sales and gross units unless otherwise specified. Products classified in the data as "MM CRT's" are folded into CDTs.

¹⁴ "The sluggishness of the desktop PC market has reduced demand for CRTs for PC monitors, leading to a sharp fall in prices." *See* Hitachi Press Release, "Hitachi to Withdraw from CRTs for PC Monitors – Company Will

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. This declaration was executed on the 15 day of April 2014, at San Francisco, California.



Vandy Howell
Vandy Howell, Ph.D.

EXHIBIT C

FILED UNDER SEAL

EXHIBIT D

FILED UNDER SEAL

EXHIBIT E

Page 1

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN FRANCISCO DIVISION
4

5 -----)

6 IN RE: CATHODE RAY TUBE (CRT))

7 ANTITRUST LITIGATION)

8 -----)

9 This Document Relates to:) No. 3:07-cv-05944SC

10 ALL ACTIONS) MDL No. 1817

11 -----)

13 HIGHLY CONFIDENTIAL

14 DEPOSITION OF TAKASHI NAKANO

15 San Francisco, California

16 Friday, July 13, 2012

17
18
19
20
21 Reported by:

22 ASHLEY SOEVYN

23 CSR No. 12019

Page 33

1	Picture Display Company, Limited.	10:29:03
2	A. Well, this company is a joint venture	10:29:33
3	company between Matsushita and Toshiba, and it had	10:29:37
4	that functionality of manufacturing and selling	10:29:41
5	CPTs. It has the functionality of that.	10:29:46
6	Q. Who controls MTPD?	10:29:49
7	MR. YOHAI: Objection as to the timeframe.	10:30:06
8	But you can answer.	10:30:08
9	THE WITNESS: Well, the shareholders of	10:30:15
10	MTPD are Panasonic and Toshiba. And in and after	10:30:17
11	March 2007, its shareholders is Panasonic.	10:30:30
12	BY MR. LAMBRINOS:	10:30:42
13	Q. When was MTPD formed?	10:30:42
14	A. The company was formed in January 2003.	10:31:18
15	And the Toshiba CRT business and Matsushita's CRT	10:31:22
16	business were transferred to it in March 2003.	10:31:29
17	Q. From January 2003 to March 2007, were	10:31:39
18	Panasonic and Toshiba equal shareholders?	10:31:43
19	A. No, they were not equal.	10:31:58
20	Q. Can you please describe the shareholding	10:32:01
21	relationship and who held what shares?	10:32:08
22	A. Up until March 2007, Panasonic owned 64.5	10:32:35
23	percent and Toshiba 35.5 percent. But in March 2007	10:32:42
24	and thereafter, Panasonic was 100 percent	10:32:49
25	shareholders.	10:32:54

Page 151

1 STATE OF CALIFORNIA) ss:

2 COUNTY OF MARIN)

3

4 I, ASHLEY SOEVYN, CSR No. 12019, do hereby
5 certify:

6 That the foregoing deposition testimony was
7 taken before me at the time and place therein set
8 forth and at which time the witness was administered
9 the oath;

10 That the testimony of the witness and all
11 objections made by counsel at the time of the
12 examination were recorded stenographically by me,
13 and were thereafter transcribed under my direction
14 and supervision, and that the foregoing pages
15 contain a full, true and accurate record of all
16 proceedings and testimony to the best of my skill
17 and ability.

18 I further certify that I am neither counsel for
19 any party to said action, nor am I related to any
20 party to said action, nor am I in any way interested
21 in the outcome thereof.

22 IN THE WITNESS WHEREOF, I have transcribed my
23 name this 17th day of July, 2012.
24

25 ASHLEY SOEVYN, CSR 12019

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EXHIBIT F

HIGHLY CONFIDENTIAL

Page 1

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN FRANCISCO DIVISION

4 Case No. 3:07-cv-05944 SC
5 MDL No. 1817

6 -----x
7 IN RE: CATHODE RAY TUBE (CRT)
8 ANTITRUST LITIGATION

9 -----x
10 This Document Relates to:
11 ALL ACTIONS

12 -----x
13 599 Lexington Avenue
14 New York, New York

15 October 9, 2014
16 9:10 a.m.

17 30(b)(6) DEPOSITION of PANASONIC
18 DEFENDANTS and its Representative ROBERT L.
19 NOWICKI, taken by the Plaintiffs, held at the
20 aforementioned time and place, before Sherri
21 Flagg, a Registered Professional Reporter,
22 Certified LiveNote Reporter, and Notary Public.

23
24
25

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Page 10

1 ceased to exist in any form; division,
2 corporate or otherwise?

3 A. That name is not in current use.

4 Q. Did the division that it was get a
5 new name?

6 A. No.

7 Q. Okay. So whatever that division
8 did or operated or controlled may have been
9 moved over to other parts of Panasonic --

10 A. That's correct.

11 Q. -- the large family?

12 A. That is correct.

13 Q. But it did not continue as a
14 self-sustaining unit?

15 A. That is true.

16 Q. Okay. Then let's go to 1(D) which
17 is the Victor Company of Japan, Limited (JVC).
18 And I'm going to use JVC for my questions to
19 stand for Victor Company of Japan, Limited. Is
20 that okay, sir?

21 A. Yes.

22 Q. Has the ownership of that entity
23 changed between 1995 and the present?

24 A. Yes.

25 Q. Okay. So then let's go back to

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Page 11

1 1995 and take it by segments. In 1995 what was
2 the ownership of Victor Company of Japan or
3 JVC?

4 A. I can only speak to Panasonic's
5 ownership and that Panasonic held A -- I'm
6 sorry, MEI, which is the Japanese parent of
7 MECA, held a 52.4 percent interest in JVC until
8 August 2007.

9 Q. Okay. Do you know of any of the
10 other major shareholders of JVC up until August
11 of 2007?

12 A. I do not.

13 Q. Okay. What happens in August of
14 2007?

15 A. Well, August 2007 into September
16 2008, Panasonic Corporation, now the name of
17 what was formerly called MEI, held a 36.8
18 percent interest in JVC.

19 Q. That's between August 2007 and
20 September 2008?

21 A. That's correct.

22 Q. Okay. And then what happens in
23 September of 2008?

24 A. As of March 31st, 2008, MEI held a
25 36.8 percent interest in the merged entity of

HIGHLY CONFIDENTIAL

Page 18

1

2

C E R T I F I C A T I O N

3

I, Sherri Flagg, a Registered Professional Reporter, Certified LiveNote Reporter, and a Notary Public, do hereby certify that the foregoing witness, ROBERT L. NOWICKI, was duly sworn on the date indicated and that the foregoing is a true and accurate transcription of my stenographic notes.

I further certify that I am not employed by nor related to any party to this action.

14

15

16

17

18

Sherri Flagg, RPR, CLR

19

20

21

22

23

24

25

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EXHIBIT G

Page 1

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN FRANCISCO DIVISION
4 CASE NO. 3:07-CV-05944-SC
5 MDL NO. 1917

6 IN RE: CATHODE RAY TUBE (CRT)
7 ANTITRUST LITIGATION

8 This Document Relates to:

9 ALL ACTIONS

10 _____/

11
12 Kenny Nachwalter, P.A.
13 201 South Biscayne Boulevard
14 Suite 1100
15 Miami, Florida 33131
16 Tuesday, November 4th, 2014
17 12:58 p.m. - 1:45 p.m.

18
19 DEPOSITION OF PATRICK BARRETT
20 as 30(b) (6) representative of Hitachi, Ltd.

21
22 Taken before Beverly Bourlier James,
23 Registered Professional Reporter, Certified Realtime
24 Reporter and Notary Public in and for the State of
25 Florida at Large, pursuant to Notice of Taking
Deposition filed in the above-mentioned cause.

Page 28

1 Electronic Devices (USA), Inc. to increase or
2 decrease prices for the CRTs sold by Hitachi
3 Electronic Devices (USA), Inc.?

4 A. No.

5 Q. During the relevant period, did Hitachi
6 Displays, Ltd. have the ability to determine or
7 modify budgetary decisions made by Hitachi Electronic
8 Devices (USA), Inc.?

9 A. No.

10 Q. Between January 1, 1995 and September 30,
11 2002, what was the percentage amount, if any, of
12 Hitachi, Ltd.'s ownership share in Shenzhen SEG
13 Hitachi Color Display Devices, Ltd.?

14 A. Hitachi, Ltd. had a 25 percent ownership
15 share in Shenzhen SEG Hitachi Color Display Devices,
16 Ltd. from January 1, 1995 to September 30, 2002.

17 Q. Between October 1, 2002 and November 7,
18 2007, what was the percentage amount, if any, of
19 Hitachi, Ltd.'s ownership share in Shenzhen SEG
20 Hitachi Color Display Devices, Ltd.?

21 A. Hitachi, Ltd. had no ownership share of
22 Shenzhen SEG Hitachi Color Display Devices, Ltd. from
23 October 1, 2002 to November 7, 2007.

24 Q. Between October 1, 2002 and November 7,
25 2007, what was the percentage amount, if any, of

Page 29

1 Hitachi Display, Ltd.'s ownership share in Shenzhen
2 SEG Hitachi Color Display Devices, Ltd.?

3 A. Hitachi Displays, Ltd. had a 25 percent
4 ownership share in Shenzhen SEG Hitachi Color Display
5 Devices, Ltd. from October 1, 2002 to November 7,
6 2007.

7 Q. When, if ever, did Hitachi, Ltd. sell its
8 ownership share in Shenzhen SEG Hitachi Color Display
9 Devices, Ltd.?

10 A. Hitachi, Ltd.'s Display Group was spun off
11 to form Hitachi Displays, Ltd. on October 1, 2002.
12 At that time, Hitachi, Ltd.'s ownership share in
13 Shenzhen SEG Hitachi Color Display Devices, Ltd. was
14 transferred to Hitachi Displays, Ltd.

15 Q. When, if ever, did Hitachi Displays, Ltd.
16 sell its ownership share in Shenzhen SEG Hitachi
17 Color Display Devices, Ltd.?

18 A. Hitachi Displays, Ltd. sold its minority
19 ownership share in Shenzhen SEG Hitachi Color Display
20 Devices, Ltd. through an agreement executed on
21 November 8, 2007.

22 Q. Between January 1, 1995 and November 7,
23 2007, did Hitachi, Ltd. have the ability to remove
24 officers or directors at Shenzhen SEG Hitachi Color
25 Display Devices, Ltd.?

Page 39

1 C E R T I F I C A T E
2

3 STATE OF FLORIDA:

4 COUNTY OF MIAMI-DADE:

5
6 I, the undersigned authority, certify that
7 PATRICK BARRETT personally appeared before me on
8 November 4, 2014 and was duly sworn by me.

9
10 WITNESS my hand and official seal this 4th
11 day of November, 2014.

12
13
14 BEVERLY BOURLIER JAMES
15 My Commission #EE091768
16 Expires September 9th, 2015
17
18
19
20
21
22
23
24
25

Page 40

1 C E R T I F I C A T E
2

3 STATE OF FLORIDA:

4 COUNTY OF MIAMI-DADE:

5 I, BEVERLY BOURLIER JAMES, a Notary Public
6 for the State of Florida at Large, hereby certify
7 that I reported the deposition of PATRICK BARRETT;
8 and that the foregoing pages constitute a true and
9 correct transcription of my shorthand report of the
10 deposition by said witness on this date.

11 I further certify that I am not an attorney
12 or counsel of any of the parties, nor a relative or
13 employee of any attorney or counsel connected with
14 the action nor financially interested in the action.

15 WITNESS my hand and official seal in the
16 State of Florida, this 4th day of November, 2014.
17

19 BEVERLY BOURLIER JAMES
20 Registered Professional Reporter
21 Certified Realtime Reporter
22 Certified LiveNote Reporter
23 Florida Professional Reporter
24 NCRA Realtime Systems Administrator
25

EXHIBIT H

Page 1

1 IN THE UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN FRANCISCO DIVISION

4
5 IN RE: CATHODE RAY TUBE (CRT))
6 ANTITRUST LITIGATION) No. 3:03-cv-05944 SC
7) MDL No. 1917

8
9 This Document Relates to:)
10 ALL PENDING ACTIONS)

CERTIFIED
TRANSCRIPT

11
12
13
14 VIDEOTAPED DEPOSITION OF WAYNE PARK
15 Los Angeles, California
16 Tuesday, November 17, 2015
17 Volume I

18
19
20
21 Reported by:
22 JUDITH A. MANGO
23 CSR No. 5584
24 Job No. 2187495
25 PAGES 1 - 148

Page 40

1 CRT, which Zenith used to buy from Toshiba.

2 Q And do you recall buying CRTs from Toshiba
3 in 1999?

4 A In 1999 I got out of Zenith, so I cannot
5 tell. But before, we bought from. 10:22:13

6 Q When did you leave Zenith in 1999?

7 A End of '98 I left.

8 Q And where did you go?

9 A LG -- back to LG Electronics. At that time
10 I was transferred to the appliance OEM division
11 located in Chicago area. 10:22:28

12 Q Who informed you of your transfer out of
13 Zenith?

14 A Michael Ahn notified me that I'm being
15 transferred out of Zenith. 10:22:49

16 Q And would that have come from above him at
17 LG, from Mr. Cho or from Mr. Koo?

18 A Yeah.

19 MR. ESTRADA: Objection; calls for
20 speculation. 10:23:00

21 THE WITNESS: Executive level movement is
22 always reported and approved by CEO.

23 BY MR. RANDALL:

24 Q And did you know whether Mr. Koo approved
25 that transfer for you in 1998, 1999? 10:23:10

Page 134

1 Q Could LG headquarters tell you what price
2 to set for a Zenith CRT-based television?

3 A They -- they cannot, because -- I have to
4 be clear. We -- we might be a little bit confused.

5 When I was doing the sales-related job in 14:02:59
6 2001, 2000, Zenith stopped manufacturing TV sales --
7 TV product and Zenith outsourced its TV product.

8 So I have to make -- if I have to sell TV
9 at a certain price, and if it -- the loss is too
10 big, then I would rather reduce the volume or 14:03:33
11 renegotiate with the outsourcing factory to cut the
12 cost down.

13 If they cannot cut the cost down, then I
14 would probably reduce the volume to reduce the limit
15 of the loss to -- to make my business plan P&L, not 14:03:51
16 target.

17 Q Let me ask you about that, because you
18 mentioned when you went back to Zenith in 2000 --

19 A Uh-hmm.

20 Q -- Zenith was no longer making its own 14:04:03
21 tubes; is that right?

22 A Right.

23 Q So at that point Zenith was outsourcing the
24 making of televisions, CRT-based televisions --

25 A Uh-hmm. 14:04:14

1 Q -- and the tubes that would go into those
2 CRT-based televisions; is that right?

3 A Uh-hmm.

4 Q Before that point in time Zenith was making
5 its own tubes -- 14:04:23

6 A Yes.

7 Q -- is that right?

8 And I think you testified that there was a
9 certain percentage of large size tubes, 32-inch,
10 36-inch, that were made by Toshiba. 14:04:34

11 A Yes, I recall that.

12 Q Was that a major percentage of the
13 CRT-based televisions sold by Zenith?

14 A No. As you have seen in the exhibit in the
15 past, it was like -- target quantity was like a 14:04:45
16 hundred thousand units of 32-inch and 40,000 units
17 in the 36-inch.

18 Generally the target quantity is the
19 optimistic number, right? So the actual production
20 per year must have been smaller than that. And that 14:05:06
21 number is a very small portion of Zenith's total
22 business volume. Very small portion.

23 Q When you say "very small portion," what
24 percentage would you put as an estimate?

25 A Estimate, less than ten percent, I should 14:05:20

1 say.

2 Q Now, after the point when you came back in
3 2000, Zenith was no longer making its own tubes and
4 they were outsourcing that production.

5 A Uh-hmm. 14:05:37

6 Q Where, geographically speaking, did they
7 outsource their production?

8 A In North America, either -- mostly in
9 Mexico border area, U.S./Mexico border area.

10 Q Why was it important that the outsourcing 14:05:53
11 happen in North America?

12 A The biggest reason was the NAFTA tariff.
13 NAFTA imposed import duty of five percent for every
14 TV set we are importing out of North Ameri -- North
15 American territory. 14:06:16

16 And, as I told you, in this
17 highly-competitive TV market where operating budget
18 is so thin, five percent gap is a very big
19 disadvantage. And also TV price is always eroding.

20 But if you buy from offshore, from Far East, Asia, 14:06:36
21 you have longer lead time, meaning you have a higher
22 risk of price erosion longer than other people and
23 also shipping cost addition.

24 So all the economy reasons dictate --
25 almost dictate you buy from North American facility. 14:06:53

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1 I, the undersigned, a Certified Shorthand
2 Reporter of the State of California, do hereby
3 certify:

4 That the foregoing proceedings were taken
5 before me at the time and place therein set forth;
6 that any witnesses in the foregoing proceedings,
7 prior to testifying, were administered an oath; that
8 a record of the proceedings was made by me using
9 machine shorthand which was thereafter transcribed
10 under my direction; further, that the foregoing is a
11 true record of the testimony given.

12 Further, that if the foregoing pertains to
13 the original transcript of a deposition in a Federal
14 Case, before completion of the proceedings, review
15 of the transcript [] was [] was not requested.

16 I further certify I am neither financially
17 interested in the action nor a relative or employee
18 of any attorney or any party to this action.

19 IN WITNESS WHEREOF, I have this date
20 subscribed my name.

21
22 Dated: 12/1/2015



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24 JUDITH A. MANGO

25 CSR No. 5584

EXHIBIT I

United States District Court
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

COSTCO WHOLESALE CORPORATION,

Plaintiff,

JUDGMENT IN A CIVIL CASE

CASE NUMBER: C13-1207RAJ

v.

AU OPTRONICS CORPORATION, AU OPTRONICS
CORPORATION AMERICA, LG DISPLAY CO., LTD.,
and LG DISPLAY AMERICA, INC.,

Defendants.

X **Jury Verdict.** This action came before the Court for a trial by jury. The issues have been tried and the jury has rendered its verdict.

— **Decision by Court.** This action came to consideration before the Court. The issues have been considered and a decision has been rendered.

THE COURT HAS ORDERED THAT

Based on the jury's October 23, 2014 verdict and the court's June 4, 2015 findings of fact and conclusions of law, the court enters judgment for Plaintiff and against Defendants for \$61,971,040.

Dated this 4th day of June, 2015.

WILLIAM M. MCCOOL
Clerk

/s Lynn Kandziora
Deputy Clerk